

SAN FRANCISCO MARINA RENOVATION PROJECT

Final Environmental Impact Report

San Francisco Planning Department
Case No. 2002.1129E
State Clearing House No. 2003122131

Draft EIR Publication Date:
September 6, 2005

Draft EIR Public Hearing Dates:
October 6, 2005 and January 12, 2006

Draft EIR Public Comment Period:
September 6, 2005 – January 20, 2006

Final EIR Certification Date:
January 11, 2007

DEFINITIONS

Some of the terms used in this document may be unfamiliar to readers. This list of definitions is provided to orient readers to the terms used to describe common features of marinas and waterfront developments that are integral to the project. Please refer to this list as necessary when reviewing the attached Environmental Impact Report.

Bow: The front of a boat.

Breakwater: A barrier that protects a harbor or shore from the full impact of waves.

Dock: A platform that forms the space for receiving or mooring a boat.

Fill: The Bay Conservation and Development Commission defines fill as “earth or any other substance or material, including pilings or structures placed on pilings, and structures floating at some or all times and moored for extended periods, such as houseboats and floating docks.”

Float: A pier that floats on top of the water, with guide piles driven as needed to maintain its location.

Gangway: A bridge for getting to and from floats and docks from the shore.

Jetty: A structure, such as a pier, that projects into a body of water to influence the current or tide or to protect a harbor or shoreline from storms or erosion.

Mole: A solid fill barrier that protects a harbor or shore from the full impact of waves, similar to a breakwater.

Pier: A pile-supported structure over water that extends out from the seawall.

Pile or piling: A long, slender column, usually of timber, steel, or reinforced concrete, that is driven into the ground to carry a vertical load. Piers and floating docks are typically supported or secured by pilings. Pilings were historically made of timber and coated with creosote (a distillation of coal tar), a substance that promoted longevity. As creosote is now known to be a contaminant, the Port of San Francisco and several state and federal regulatory agencies require the use of concrete, steel, or pressure-treated wood pilings.

Revetment: A facing of wood, stone, or any other material placed to sustain an embankment when it receives a slope steeper than the natural slope; also, a retaining wall.

Riprap: A loose assemblage of broken stones erected in water or on soft ground as a foundation.

Seawall: A retaining wall that separates land from a body of water.

Stern: The rear of a boat.

SAN FRANCISCO
CITY PLANNING COMMISSION
MOTION NO. 17357

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SAN FRANCISCO MARINA RENOVATION PROJECT, LOCATED AT 3950 SCOTT STREET AT MARINA BOULEVARD, ASSESSOR'S BLOCK 0900, LOT 003.

MOVED, That the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as case file No. 2002.1192E, San Francisco Marina Renovation Project (hereinafter "Project") based upon the following findings:

1) The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 *et seq.*, hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 *et seq.*, (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

a. The Department determined that an Environmental Impact Report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on October 9, 2004.

b. On September 6, 2005, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

c. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by Department staff on September 6, 2005.

d. On September 6, 2005 copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.

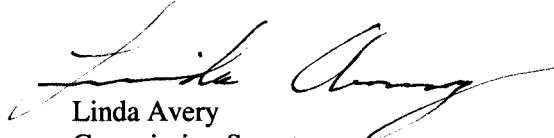
e. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on September 6, 2005.

- 2) The Commission held a duly advertised public hearing on said Draft Environmental Impact Report on October 6, 2005 and January 12, 2006 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on January 20, 2006.
- 3) The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 136-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a "Draft Comments and Responses" document, published on September 28, 2006, was distributed to the Commission and to all parties who commented on the DEIR, and was available to others upon request at Department offices.
- 4) A Final Environmental Impact Report has been prepared by the Department, consisting of the Draft Environmental Impact Report, any consultations and comments received during the review process, any additional information that became available, and the Summary of Comments and Responses all as required by law.
- 5) Project Environmental Impact Report files have been made available for review by the Commission and the public. These files are available for public review at the Department offices at 1660 Mission Street, and are part of the record before the Commission.
- 6) On January 11, 2007, the Commission reviewed and considered the Final Environmental Impact Report and hereby does find that the contents of said report and the procedures through which the Final Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of CEQA, the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code.
- 7) The Planning Commission hereby does find that the Final Environmental Impact Report concerning File No. 2002.1192E, San Francisco Marina Renovation Project, reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Comments and Responses document contains no significant revisions to the DEIR, and hereby does CERTIFY THE COMPLETION of said Final Environmental Impact Report in compliance with CEQA and the CEQA Guidelines.
- 8) The Commission, in certifying the completion of said Final Environmental Impact Report, hereby does find that the project described in the Environmental Impact Report will have no significant unavoidable impacts at either the project-specific or the cumulative level.

CITY PLANNING COMMISSION

File No. 2002.1129E
Assessor's Block 0900, Lot 003
Motion No. 17357
Page Three

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of January 11, 2007.



Linda Avery
Commission Secretary

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Changes from the Draft EIR text are indicated by a dot (●)
in the left margin (adjacent to the page number for figures).

This document is printed on recycled paper.

TABLE OF CONTENTS

SAN FRANCISCO MARINA RENOVATION PROJECT FINAL ENVIRONMENTAL IMPACT REPORT

	<u>Page</u>
S. SUMMARY	
A. Project Description	S-1
B. Main Environmental Effects	S-4
C. Areas of Controversy and Issues to Be Resolved	S-17
D. Mitigation Measures	S-18
E. Improvement Measure	S-22
F. Mitigation Measures from Initial Study	S-23
G. Improvement Measures from the Initial Study	S-26
H. Alternatives to the Proposed Project.....	S-27
I. INTRODUCTION.....	I-1
II. PROJECT DESCRIPTION	
A. Site Location	II-1
B. Project Characteristics	II-5
C. Project Sponsor's Objectives	II-12
D. Approvals Required	II-14
III. ENVIRONMENTAL SETTING AND IMPACTS	
A. Land Use, Plans, and Policies	III.A-1
B. Visual and Aesthetic Resources	III.B-1
C. Historic Resources	III.C-1
D. Soils, Geology, and Seismicity	III.D-1
E. Hydrology and Water Quality.....	III.E-1
F. Hazardous Materials and Waste.....	III.F-1
IV. MITIGATION AND IMPROVEMENT MEASURES	
A. Mitigation Measures Identified in the EIR	IV-2
B. Mitigation and Improvement Measures from the Initial Study	IV-6
V. OTHER CEQA TOPICS	
A. Significant Environmental Effects That Cannot Be Avoided If the Proposed Project Is Implemented	V-1
B. Growth-Inducing Impacts	V-1
C. Areas of Controversy and Issues to Be Resolved	V-2

	<u>Page</u>
VI. ALTERNATIVES TO THE PROPOSED PROJECT	
A. No Project	VI-1
B. No New West Harbor Breakwaters.....	VI-3
C. West Harbor Renovation Only.....	VI-5
D. Removal of the Former Degaussing Station and Expansion of the Harbor Office..	VI-7
VII. DRAFT EIR DISTRIBUTION LIST.....	VII-1
● VIII. SUMMARY OF COMMENTS AND RESPONSES	C&R-1
● IX. EIR AUTHORS AND CONSULTANTS	
A. EIR Authors	IX-1
B. EIR Consultants	IX-1
C. Project Sponsor	IX-2
● X. REFERENCES	X-1
● XI. APPENDICES	XI-1
A. Notice of Preparation and Initial Study	A-1
B. East Harbor Design Guidelines.....	B-1
C. Moffatt & Nichol Engineering, San Francisco Marina Renovation Project Breakwater Improvement Study	C-1

LIST OF FIGURES

1. Project Location	II-2
2. Existing Site Plan	II-4
3. Proposed Site Plan.....	II-7
4. Viewpoint Locations	III.B-5
5. Existing and Proposed Views from Viewpoint Location 1	III.B-6
6. Existing and Proposed Views from Viewpoint Location 2	III.B-9
7. Existing and Proposed Views from Viewpoint Location 3	III.B-10
8. Existing and Proposed Views from Viewpoint Location 4	III.B-11
9. Existing and Proposed Views from Viewpoint Location 5	III.B-14
10. Existing and Proposed Views from Viewpoint Location 6	III.B-15
11. Approximate Seawall Alignments.....	III.D-2
12. Seismic Hazard Zones	III.D-7

LIST OF TABLES

1. Proposed Waterside Improvements.....	II-8
2. Proposed Landside Improvements	II-10
3. Summary of Regulatory Authorities and Jurisdictions and Likely Permit Requirements Relating to Water Quality	III.E-8
4. Soil Disposal/Reuse Criteria and Maximum Detected Onsite Concentration in East Harbor Sediments	III.F-3

SUMMARY

This chapter is a summary of the findings of the Draft Environmental Impact Report (EIR) prepared by the San Francisco Planning Department for the San Francisco Marina Renovation Project. This chapter includes mitigation and improvement measures to reduce or avoid potentially significant impacts of the proposed project, as well as presents alternatives to the proposed project.

A. PROJECT DESCRIPTION

PROJECT SETTING

The San Francisco Marina (the marina) is in the Marina District on San Francisco's northern waterfront, on property under the jurisdiction of the San Francisco Recreation and Park Commission. The marina consists of two harbors: the West Harbor and the East Harbor, also known as Gashouse Cove.

The West Harbor is generally bounded by Marina Boulevard and the western end of the Marina Green to the south, Yacht Road and the outer jetty to the north, the harbor entrance to San Francisco Bay to the east, and Yacht Road to the west. The West Harbor covers about 1,100,000 square feet of water area in two basins: an inner basin and an outer basin (about 39 acres in total for both harbors). The total land area of both harbors, including sidewalks, gangways, and parking, covers about 830,000 square feet (about 19 acres). The West Harbor marina facilities include the Harbor Office building (which also houses a public restroom and tenant showers), a public restroom, a refreshment concession stand, four parking lots, and slips to accommodate 326 boats. The Recreation and Park Department also uses a San Francisco Public Utilities Commission (SFPUC) pump station as a maintenance building in the West Harbor to support marina operations. Adjacent to the West Harbor but outside of the project area are the St. Francis and Golden Gate Yacht Clubs, a miniature lighthouse (no longer in use), and the wave organ at the tip of the north jetty.

The East Harbor encompasses about 600,000 square feet of water area and is bound by Beach Street to the south, San Francisco Bay to the north, Lower Fort Mason to the east, and Marina Boulevard and Webster Street to the west. The East Harbor marina facilities consist of slips for 342 boats, yacht sales and fuel concession, a nonoperational boat hoist, a public restroom, two vehicle parking lots, and one parking lot for trailered boats (currently unused). Boat slips in both harbors consist of wooden floating docks and gangways supported by creosote-treated wood pilings. Slips are supplied with water and electrical service, and docks are lighted at night.

On the project site between the East and West Harbors is the former U.S. Navy Degaussing Station,¹ located on the water's edge roughly north from the end of Fillmore Street. The Degaussing Station is separated from the Marina Green by a parking lot. The Marina Green is also located between the two harbors, but is just outside of the project boundaries. This approximately seven-acre public park is bound by Marina Boulevard to the south, San Francisco Bay to the north, Scott Street to the west, and Webster Street to the east.²

The marina is used year-round as a recreational boating center. Berths at the marina are in high demand, with an active waiting list of several hundred boat-owners. Both harbors are in a degraded condition due to deferred maintenance, damage from wave action and storms, and routine use. Some damaged marina facilities have been removed over the years (due to the cost of repairs), and many of the existing docks and associated utilities have become obsolete or unsafe for marina tenants, guests, and other users.

PROJECT CHARACTERISTICS

The San Francisco Marina Renovation Project (the project) consists of renovations to selected marina facilities in both the East and West Harbors of the San Francisco Marina. The project includes waterside improvements over the entire 39-acre waterside portion of the marina and on 12 of the total 19 landside acres, as well as renovation of the 700-square-foot former U.S. Navy Degaussing Station for use as a new Harbor Office. The project does not include any improvements to the St. Francis or Golden Gate Yacht Clubs, the lighthouse, the Marina Green, or the SFPUC pump station, and Recreation and Park Department use of the SFPUC facility would end.

Waterside marina renovations would include installation of three new breakwater segments (one floating breakwater in the East Harbor and two rock-filled or sheetpile-type breakwaters in the West Harbor); removal of two breakwater structures (moles) in the West Harbor near the foot of Scott Street; reconstruction of portions of the degraded riprap slopes around the interior shorelines of both harbors; replacement and reconfiguration of the floating docks and slips in both harbors, including replacement of wood piles with concrete piles; addition of two hand boat launches (one in the East Harbor and one in the West Harbor); and maintenance dredging of about 181,000 cubic yards of material (87,000 cubic yards from the West Harbor and 94,000 cubic yards from the East Harbor). Other waterside project components include replacement of gangways and security gates; installation of one oily water and sewage pumpout facility in the West Harbor (and refurbishment of the two existing sewage pumpouts, one in the West Harbor and one in the East Harbor); and upgrades of electrical and water services to the new floating

¹ The Degaussing Station was used by the U.S. Navy as a base for demagnetizing ships during the World War II era. Ships going into or coming out of the harbor were demagnetized to prevent them from attracting magnetic mines.

² While there is no legal definition of the Marina Green boundaries, this area is commonly associated with the rectangular greensward bound by Marina Boulevard on the south, San Francisco Bay on the north, Scott Street on the west, and Webster Street on the east. Parkland areas east of Webster Street are associated with the East Harbor of the San Francisco Marina and are therefore not considered part of the Marina Green. This area is referred to as the East Harbor open space area.

docks and improved lighting on the docks in both harbors. At project completion, the total number of boat berths (slips) would decrease from 668 to 628, although the average slip length would increase from about 32 to 38.5 feet. Not included in the total number of slips are four 110-foot berths in the West Harbor leased to the St. Francis Yacht Club, which would remain unchanged under the project.

While the total number of boat slips would decrease by 40, the area of water currently occupied by floating docks would increase by about 34,000 square feet. New docks and slips would be located in portions of the outer basin of the West Harbor where none currently exist,³ and about 40 percent of the slips in the West Harbor would be realigned from a north-south orientation to an east-west orientation to face the prevailing winds for safer maneuvering. All new berths in the East Harbor would maintain their existing north-south orientation.

The dredging plan for the marina is currently in the design stages; however, dredging activities, including sediment disposal, would occur in accordance with Regional Water Quality Control Board permit requirements and other regulatory directives. It is expected that dredging activities in the East Harbor would entail a few feet of overdredging and installation of an engineered cap of clean fill to prevent the disturbance of potentially contaminated sediments in this area. The proposed breakwaters are also in the design stages. As currently envisioned, two rock-filled or sheetpile breakwaters would be constructed in the Outer Basin of the West Harbor, and a floating, pile-supported breakwater would be constructed in the East Harbor. These breakwaters would protect marina structures from locally generated wind-waves from the north and northeast directions.

The landside project improvements would include renovation of the public restrooms in the Harbor Office and conversion of the existing office space (400 square feet) into tenant showers and restrooms; renovation of the former U.S. Navy Degaussing Station (now vacant) for use as the new Harbor Office; renovation of the restrooms in the existing 1,970-square-foot East Harbor public restroom building, with the addition of about 600 square feet for tenant showers and restrooms; construction of a new 1,000-square-foot, one-story maintenance building near the East Harbor restrooms (used to store material for maintenance of marina facilities); improvements to onshore electrical and telephone utilities; and access modifications to the parking lots. With the construction of the new maintenance building for material storage, the Recreation and Park Department would no longer use the existing 1,500-square-foot SFPUC pump station in the West Harbor, which would remain unoccupied.

Additional landside improvements would include new and improved informational and instructional signs in the marina in addition to parking lot improvements. No change in the number of parking spaces would occur at either the East or West Harbor parking lots, although access control barriers would be installed to allow boater-only access to designated parking spaces between the hours of 10:00 p.m. and 6:00 a.m. (when the marina is closed). These parking

³ Many of the new berths would technically replace berths that historically existed in the outer basin of the West Harbor but were removed over time due to deterioration or unsafe conditions (about 21 berths). For purposes of this EIR, however, they would be considered new.

spaces are currently designated as boater-only parking between the hours of 10:00 p.m. and 6:00 a.m., although no access controls are in place. The East Harbor parking area would be improved by renovating an existing boat hoist for boat launching and utilizing the former boat trailer storage area immediately southeast of the boat hoist. The roughly 13,600-square-foot boat trailer storage area is currently unused because the boat hoist is nonoperational, but has the capacity to hold a maximum of about 24 trailered boats at one time. Once the boat hoist has been renovated, it is expected that trailered boat storage would return on a daily basis, and that some of the small craft currently berthed at the marina would convert to put-in/take-out use.

Public access improvements would be made to public restrooms as well as along a portion of the East Harbor breakwater. Americans with Disabilities Act (ADA)-compliant access ramps would be added in the East and West Harbors.

Construction of the proposed project would begin in 2007 and is expected to take up to about 36 months (about 20 months in the West Harbor and 16 months in the East Harbor).

B. MAIN ENVIRONMENTAL EFFECTS

LAND USE, PLANS, AND POLICIES (p. III.A-1)

With the project, there would be no change to the existing variety of recreational and open space uses on the project site. The project would not disrupt recreational uses on the Marina Green, nor would it adversely affect ongoing recreational uses at either the St. Francis or Golden Gate Yacht Clubs. While the proposed project would make changes to site development, it would not disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any businesses, residences, or other uses.

Implementation of the proposed project could attract new boaters and recreation users to the project site with the addition of hand boat launches, renovation of the boat hoist, and improvements to public access and restrooms. Maritime and recreation uses, however, have been ongoing at the site and vicinity for many years, and the proposed project would therefore be consistent with the site's existing uses. Implementation of the project would result in fewer, although (on average) longer, berths in the marina, which could attract some larger boats to the marina; however, several boats currently moored at the marina are in berths that are too small, and some marina tenants are expected to move their boats into the larger berths (Gross, 2004). Even with the addition of larger boats, there would be a continuation of a compatible use in the project area.

Reoriented slips or the addition of slips and docks within the outer basin of the West Harbor where none currently exist would also be a continuation of compatible uses in the project area, and therefore would not have a significant land use effect. In addition, the loss of the north-south mole at the foot of Scott Street, which is a popular destination for public viewing, seating, strolling, etc., would not have a significant land use impact, as these uses would continue to be available in other locations at

- the marina, including the entire length of the Fair's Seawall⁴ as well along the East Harbor breakwaters.

The currently vacant Degaussing Station would be renovated for use as the new Harbor Office, shifting both office workers and visitors from the existing Harbor Office in the West Harbor to the Degaussing Station. However, overall usage levels of this facility and hours of operation under project conditions would represent a continuation of an existing use and are not expected to

- increase compared to current usage levels and hours of operation (8am to 4pm, seven days a week). As a result, no significant land use impacts associated with renovation of the Degaussing Station are expected.

The proposed maintenance building in the East Harbor area would be constructed on land dedicated primarily to open space (except for the East Harbor restroom and parking lots). While the maintenance building would occupy about 1,000 square feet of the project area currently unoccupied by structures, such use would not be inconsistent with the recreation and park uses on the site, as it would be an ancillary structure devoted to maintenance of the recreation facilities. Furthermore, a similar building already exists on the site (i.e., the SFPUC building). The SFPUC building would no longer serve as the marina's maintenance facility, as such uses would be shifted to the new maintenance building. The project would also expand the 1,970-square-foot restroom facilities in the East Harbor by approximately 600 square feet to add tenant showers and restrooms. This action would represent a minor expansion and an enhancement of a current use and would bring the publicly accessible facilities up to ADA compliance. The construction of the maintenance building and the expansion of the existing bathrooms in the East Harbor open space area would reduce the usable lawn area by about 0.02 acres, or about 2 percent of the two-acre open space area, a relatively small amount that would not preclude the use or enjoyment of area for recreational purposes. As a result, no significant land use impacts associated with new construction or conversion in the East Harbor are expected.

During the project's construction phases, marina users would be temporarily displaced; however, construction of project improvements would occur in phases, and temporary berthing within the marina would be made available to those users directly affected. The construction would be phased to provide for initial reconstruction of slips that have been removed due to past deterioration. These new slips would be used to accommodate boats as they are temporarily displaced for dredging, pile driving, and dock rebuilding in a small section of the marina. A tenant relocation plan would be distributed, and the opportunity to discuss the plan with marina management would be given to marina tenants prior to construction.

The proposed project would have temporary impacts on landside site uses during construction, since the restrooms and Harbor Office would be closed for short periods during renovations. Temporary, portable toilet cabinets would be moved onto the site during restroom renovations. The Degaussing Station would be renovated prior to the Harbor Office so that office equipment and personnel could be moved to their new locations prior to renovation of the Harbor Office.

⁴ The Fair's Seawall retains the northern edge of the Marina Green, a portion of which is a remnant from the 1915 Panama-Pacific International Exposition (i.e., the "Fair"). This seawall is differentiated from the Marina Boulevard Seawall, which is parallel to Marina Boulevard, and retains the northern edge of this roadway in the project area.

The proposed project would not substantially affect any of the existing offsite, adjacent uses and activities, such as the open space in the Marina Green or the wave organ located at the end of the West Harbor's outer jetty. Access to the outer jetty and the wave organ might be temporarily restricted during the installation of riprap on the south side of the jetty, but public access to this popular waterfront spot would not be permanently restricted. Surrounding uses and activities would therefore generally continue and would interrelate with each other as they do presently, without disruption due to the proposed project and with no change in the character of the area. Therefore, the project would not result in significant impacts related to land use.

The proposed project would not have a substantial adverse impact on the existing character of the project site or on the neighborhood character of the site's vicinity. As discussed above, the proposed project would undertake improvements to the marina and would not substantially alter its use as a boating and recreation center. The project would improve the character of the area by undertaking public-access upgrades, such as ADA improvements, and a new pathway along the breakwater in the East Harbor. Moreover, the project would upgrade both the East and West Harbor restrooms, thereby enhancing these public conveniences. These improvements would not detract from the character of the site or vicinity.

Although the project would replace and reorient some of the existing berths to accommodate slightly larger craft (on average), this change would not represent an adverse impact to the character of the site or its surroundings, as new uses would be consistent with existing maritime/recreational uses. As the presence of potentially larger and/or reoriented craft could alter the visual environment, these changes are analyzed in Section III.B, Visual and Aesthetic Resources.

Surrounding uses and activities would generally continue and would interrelate with each other as they do presently, without disruption due to the proposed project and with no adverse change in the character of the area. Therefore, the project would not result in significant impacts related to neighborhood character.

VISUAL AND AESTHETIC RESOURCES (p. III.B-1)

The analysis of the project's effect on visual and aesthetic resources revolves around three criteria: whether the project would substantially degrade or obstruct public scenic views or vistas; whether implementation of the project would result in a demonstrative negative aesthetic effect; and whether the project would generate obtrusive light and glare that would substantially affect other properties. Section III.B, Visual and Aesthetic Resources, includes existing and simulated photos of the project site from five public vantage points. The Initial Study prepared for this project (see Appendix A) determined that the proposed project would not generate obtrusive light and glare effects. The project's aesthetic effects, described more fully in this EIR, are summarized below.

The project would construct a new maintenance shed and modify existing structures on the project site (e.g., the vacant Degaussing Station, restrooms, and boat launch). The project's

proposed landside changes would not substantially obstruct scenic views from public viewpoints. In the case of the proposed maintenance building, the approximately 1,000-square-foot structure would be located in front of the existing restrooms, and in front of trees that partially obscure long-range views of the Bay to the northeast. Waterside changes entail new floating docks in the East and West Harbors; upgraded floating docks would improve the overall visual quality as well as short-range views of the harbors from public viewing locations along pedestrian pathways. In addition, the project's proposed breakwaters would be constructed from materials that would be consistent with the marina's character. Moreover, the breakwaters would be about 8 feet above mean high tide and therefore would not substantially obstruct long-range views. Views of boats would continue to be a component of the visual landscape at the marina, and the potential increase in boat size would not substantially degrade or obstruct important scenic public viewpoints.

Short-range views from the Marina Green looking north could contain potentially larger craft that may moor in the marina under project conditions, but mid-range views of Fort Mason (to the northeast) and long-range views of the Golden Gate Bridge, Angel Island, Alcatraz Island, and the Marin Headlands (to the north and northwest) would remain essentially the same. For these reasons, the proposed project would not substantially degrade or obstruct any scenic views from public places.

The project would renovate the currently vacant, 700-square-foot Degaussing Station for use as the Harbor Office. The project would not alter the Degaussing Station's footprint and would not add square footage to the building. The project would alter the appearance of the Degaussing Station by removing the fencing surrounding the building, enclosing its porch (to serve as an entry vestibule), and adding a new egress. Other renovations would be limited to the interior of the building. As such, the appearance of the future Harbor Office in existing views from the Marina Green, Fair's Seawall, Marina Boulevard, and Fort Mason Center would not be substantially altered under project conditions.

The proposed maintenance facility, to be constructed in the East Harbor open space area, would be visible from Marina Boulevard, Fort Mason, and nearby private residences and businesses. The new 1,000-square-foot, single-story (about 15-foot-high) maintenance building would be located near the existing East Harbor public restroom to minimize view blockage of the marina and open water beyond when looking north, as the new building would be directly in front of (south from) the existing building. Although not yet designed, the proposed maintenance building and exterior modifications to the East Harbor restroom would incorporate design elements of existing onsite buildings, including details of fenestration, color, and building materials. (The simulation in Figure 6B, p. III.B-9, in Section III.B, Visual and Aesthetic Resources, depicts this building as a cement block structure, without fenestration, to illustrate a "worst-case" scenario.) Changes to the East Harbor restroom would be partially visible behind the new maintenance structure and from other nearby vantage points. The proposed location of the maintenance building (in front of tall trees and adjacent to existing structures) would not substantially degrade or obstruct important scenic views now observed from public viewpoints. The views are partially obstructed under existing conditions; under project conditions, the trees and other buildings

adjacent to the maintenance building would continue to obstruct views of Tiburon and the Marin Headlands in the distance, although from certain vantage points the view blockage would be slightly greater due to the new maintenance building. The existing marina facilities would continue to be visible under the proposed project.

In summary, the proposed project would include limited additions to and renovations of existing onsite structures in an area already developed with maritime uses. As described above, the project would alter some short- and long-range views from public viewing locations on the site and in its vicinity, including views from the Marina Green and neighboring streets. However, the site's use as a harbor and the associated maritime character would continue under project conditions. Moreover, the project's proposed public-access improvements could enhance the character of the site and its surroundings by allowing for greater access to portions of the site that are currently not available, such as on the East Harbor breakwater. This improved access could allow for greater public enjoyment of the site and surroundings, providing additional opportunities for scenic vistas from areas not currently accessible to pedestrians. Although visual quality is subjective, it can reasonably be concluded that the proposed project would not result in a substantial, demonstrable negative aesthetic effect on the visual character or quality of the area and its surroundings.

HISTORIC RESOURCES (p. III.C-1)

No facilities at the marina are listed in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR), nor are they listed in the Directory of Properties in the Historic Property Data File for San Francisco County, which is maintained by the California Office of Historic Preservation. Prior to 2003, none of the buildings or structures at the marina had been previously surveyed or evaluated for their potential historic significance, with the exception of the former Degaussing Station, which the U.S. Navy evaluated in 1995 and determined ineligible for listing in the NRHP.

In a historic resources survey commissioned by the City and County of San Francisco for this EIR, and completed by Carey & Co., Inc. in 2004, a total of four buildings or structures on the project site were identified as historic resources for purposes of the California Environmental Quality Act (CEQA). Two of these resources—the Fair's Seawall (that portion of the seawall retaining the north side of the Marina Green) and the concession stand in the West Harbor—possess historic significance and sufficient physical integrity to qualify as historic resources at the federal and state level for their association with historic events: the Works Progress Administration improvement program undertaken in San Francisco during the Great Depression. In addition, the Planning Department's technical preservation specialist found that two other buildings on the project site—the Harbor Office and the West Harbor restrooms—may also have historic significance at the local level, as they could become contributors to a potential future West Harbor historic district or cultural landscape. The remainder of the buildings and structures on the project site were found to lack sufficient historic significance and/or physical integrity for listing in the NRHP or CRHR, or for designation as a city landmark, either individually or as a

group. These include all of the facilities in the East Harbor, the West Harbor jetty, the former U.S. Navy Degaussing Station, and all docks and slips in both harbors.

In the project vicinity, Carey & Co. identified the Marina Green and the marina lighthouse as historic resources for CEQA purposes. Other historic resources in the project vicinity include Fort Mason, the San Francisco Port of Embarkation National Historic Landmark District, the San Francisco Maritime National Historic Park, and the Palace of Fine Arts.

Of the four historic resources identified on the project site, the proposed project has the potential to adversely affect the historic significance of two of them: the Fair's Seawall and the Harbor Office. These potentially significant impacts are described below.

The proposed project would construct a new breakwater and ADA-compliant ramp in the outer basin of the West Harbor that would abut the Fair's Seawall. The breakwater would be perpendicular to the seawall, extending about 200 feet into the outer basin of the West Harbor and likely attaching to the face of the seawall for a distance of about 15 to 20 feet. In addition, the new ramp would descend from the top of the seawall to a new floating dock to be constructed below and about 20 feet to the north of the seawall. An existing stone staircase descends from the top of the seawall into the water in the approximate location of these improvements. As the final designs for the breakwater and the ADA ramp have not been completed, it is possible that these improvements could damage or substantially alter the Fair's Seawall, including its sloped, cobblestone face and possibly one of its stone staircases, both of which are considered character-defining features of this resource. Damage or substantial alteration to a historically significant resource is considered a potentially significant impact under CEQA. Mitigation Measure HIST-1 (see p. S-18) would require the project sponsor to ensure that the new West Harbor breakwater and associated ADA-compliant ramps are designed in accordance with the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings (Standards)*, so as to avoid damage or substantial alterations to the cobblestone façade of the Fair's Seawall and nearby stone staircase. This measure would also require review of project designs by the Planning Department's preservation technical specialists for compliance with the *Standards*. Implementation of this measure would reduce potential impacts to the seawall to a less-than-significant level.

Another potential impact to the Fair's Seawall could include damage from exposure to wave action due to removal of the (north-south) mole at the foot of Scott Street. This potential impact is described more fully in Section III.D, Soils, Geology, and Seismicity, but is reiterated here as it pertains to a potential historic resource. According to the engineering report prepared by Moffatt & Nichol Engineering in 2004 for this EIR (see Appendix C), wave heights could increase slightly at the location where the mole would be removed. Although damage from exposure to this amount of wave action would not likely be sufficient to make the seawall more susceptible to structural failure, damage could occur as the project design has not been finalized. Damage or substantial alteration to a historically significant resource is considered a potentially significant impact under CEQA. Mitigation Measure GEO-2 (see p. S-20) requires the project sponsor to visually inspect the Fair's Seawall where the mole at the foot of Scott Street would be removed, and install toe protection similar to existing conditions on the remainder of the seawall, to protect

this newly exposed section of the seawall from damage. Structural investigations would be conducted in the vicinity of the mole removal and identified structural defects repaired promptly. Implementation of this mitigation measure would result in a less-than-significant impact to this potential historic resource.

Under the proposed project, the interior of the Harbor Office would be adapted for restroom uses only; two public restrooms would be located on the eastern end of the building, and two restrooms for marina tenants on the western end, separated in the center by a wall. This renovation would occur primarily on the interior of the building and would be completed in accordance with ADA requirements. While interior alterations to historic resources are typically not considered an impact under CEQA (unless significant, character-defining interior features have been identified), the renovation activities could substantially alter portions of the building that are visible from the exterior. The Planning Department has stated that the proposed project could impair the integrity of the building and affect the possible future creation of a historic district or cultural landscape. As the final designs for the renovation have not been completed, it is possible that these improvements could change the exterior of the Harbor Office to the extent that it would no longer qualify as a historic resource, resulting in a potentially significant impact to historic resources under CEQA. Mitigation Measure HIST-2 (see p. S-19) requires the project sponsor to ensure that renovations to the Harbor Office are consistent with the *Standards*, so as to avoid substantial alterations to this potentially eligible historic resource. This measure would also require review of project designs for compliance with the *Standards* by the Planning Department's preservation technical specialists. Implementation of this measure would reduce potential impacts to the seawall to a less-than-significant level.

The proposed project was also evaluated for its potential impacts to historic resources in the immediately project vicinity, especially to Pier 1, a contributing structure to Fort Mason and the San Francisco Port of Embarkation National Historic Landmark District. These potential impacts are described more fully in Section III.D, Soils, Geology, and Seismicity, but are reiterated here as they pertain to historic resources.

Construction of a new floating breakwater in the East Harbor parallel to, and 10 to 20 feet from, Pier 1 at Fort Mason Center could have vibration and/or liquefaction impacts, potentially damaging this historic resource. Vibration and/or liquefaction impacts would occur primarily from pile driving to install the new breakwater. Pile driving could weaken the adjacent pier, which has known structural deficiencies. In addition, wave energies from a new floating breakwater in the East Harbor could be directed toward the substructure of the adjacent Pier 1 facility, potentially damaging or weakening this historic resource.

Moffatt & Nichol Engineering evaluated the potential effect of a new floating breakwater on the substructure of Pier 1 in a technical report prepared for this EIR (see Appendix C). This report was peer-reviewed by an independent engineering firm, which confirmed the report's findings. As the specific vibration-related impacts to Pier 1 cannot be quantified until further design details for the proposed floating breakwater become available, such impacts are assumed to be potentially significant. Mitigation Measure GEO-4 (see p. S-20) requires the project sponsor to

prepare a geotechnical investigation in the area where the piles for the East Harbor breakwater would be installed, including a pile design analysis to further evaluate the potential pile types and the effects of pile driving. The analysis would be performed to determine if an alternative pile type or installation method would minimize vibration and/or liquefaction hazards. If warranted by the analysis, a test pile program would be conducted to measure underwater vibration as well as piling deflections. Implementation of this measure would reduce potential vibration impacts to the adjacent Pier 1 to a less-than-significant level.

Moffatt & Nichol Engineering also evaluated the potential effects of wave loads on Pier 1 that could increase due to reflected (attenuated) wave energies from the proposed floating breakwater. The engineering report determined that the increase in attenuated wave load would be well within the structural capacity of Pier 1 to absorb such wave loads, including during storm events (see Appendix C). As a result, the potential impact to Pier 1 from breakwater wave attenuation was determined to be less than significant.

Finally, the historic resource evaluation determined that the proposed project would have no significant impacts to the setting of historic resources in the project vicinity. The evaluation found that proposed project features in the East Harbor would not be incompatible with the maritime-industrial setting of the adjacent Fort Mason and the San Francisco Port of Embarkation National Historic Landmark District, such that their historic significance as national, state, or local historic resources would be materially impaired. Regardless, the project sponsor has worked with the National Park Service/Golden Gate National Recreation Area (NPS/GGNRA) to prepare and implement design guidelines intended to preserve existing views and manage the massing, scale, site coverage, articulation, and character of new development at the marina. These guidelines are described as Improvement Measure HIST-1 (p. S-22; also see Appendix C).

SOILS, GEOLOGY, AND SEISMICITY (p. III.D-1)

This section discusses potential impacts related to seismic and geologic hazards, including ground shaking and associated secondary effects, coastal erosion, and offsite sedimentation. This section also discusses potential effects on the adjacent Fort Mason structures. The project site is located in an area that would be subject to strong ground shaking and potential liquefaction in the event of a major earthquake on the San Andreas or Hayward faults. The high water table and unconsolidated sediments and fill materials in the vicinity can amplify ground shaking and result in liquefaction and settlement, which can cause considerably more structural damage than would be experienced by a building placed on materials such as bedrock or more consolidated sediments. During future earthquakes, liquefaction could damage one or both of the marina seawalls.

Two investigations were conducted on behalf of the City and County of San Francisco to evaluate the potential for liquefaction to occur within the Marina District and to predict the effects of liquefaction on the Fair's Seawall and the Marina Boulevard Seawall. The studies concluded that it would not be economically feasible to construct ground improvements to reduce liquefaction effects in large areas, and that ground improvements behind the Fair's Seawall would be required

only if the goal were to reduce settlement in the entire Marina Green. Instead, ground improvements could be applied in strategic areas, such as near underground utilities, to reduce the effects of liquefaction at a given location. However, even with improvements, the seawalls could be damaged by areawide spreading during a magnitude 7.9 or greater earthquake. The reports state that the City could choose to repair the seawall, utilities, and sidewalk/jogging path behind the seawall after an earthquake.

The investigations discussed above indicate the potential for the seawalls to move and settle in the event of a major earthquake on the San Andreas or Hayward faults. The proposed project would not significantly alter the seawalls, nor would this existing areawide risk be substantially worsened by the proposed project.

The California Seismic Hazards Mapping Act (CSHMA) (Public Resources Code, Section 2690 et seq.) and the San Francisco Building Code require a geotechnical investigation and geotechnical report be prepared for new or renovated buildings, constructed in liquefaction zones, that would be inhabited for more than 2,000 person-hours per year, or for renovations that would exceed 50 percent of the floor area of the building or more than 50 percent of the value of the building. As renovation plans have not been finalized, it is not known whether the CSHMA and its requirement for a geotechnical investigation and geotechnical report would apply to renovations of the Degaussing Station. Because the Degaussing Station is in an area where liquefaction hazards are present, reoccupancy of the building could expose people to a seismic hazard under the proposed project. Without mitigation, this impact would be potentially significant. To reduce the seismic risk to an acceptable level, a geotechnical investigation and geotechnical report would be prepared as part of the proposed renovations to the Degaussing Station, as specified in Mitigation Measure GEO-1 (see p. S-19). The investigation would evaluate the potential for liquefaction to occur on or near the site and would identify measures to reduce seismic hazards to an acceptable level. Technically feasible measures could include incorporating a concrete mat foundation or a “grade beam” foundation system into the building design, allowing the building to “float” without substantial structural damage in the event of earthquake-induced liquefaction, thereby reducing human exposure to seismic risks to an acceptable level. The final building plans would incorporate the recommendations of the geotechnical report, and the project sponsor would obtain review by the San Francisco Department of Building and Inspection (DBI) as a condition of project approval.

The proposed removal of the mole at the foot of Scott Street would expose a portion of the Fair’s Seawall to wave action. This exposure to wave action should not be sufficient to make the seawall more susceptible to failure or earthquake damage, and the mole would be removed in accordance with accepted engineering standards. However, because the design of the project has not been finalized, damage to the seawall could occur. Such potential damage to the seawall would be considered a significant impact. To reduce this potential impact, Mitigation Measure GEO-2 requires that the newly exposed portion of the seawall be inspected during construction, toe protection similar to what exists along the rest of the seawall be installed, periodic inspection be conducted for structural defects in the vicinity of the mole removal, and any defects be repaired (see p. S-20). Although the new breakwater installed within the West Harbor would

likely attach to the face of the Fair's Seawall for a distance of 15 to 20 feet, the method of attachment would be determined during the design phase of the project and would be in accordance with acceptable engineering standards. Therefore, the project's proposed West Harbor breakwater would not affect the structural integrity of the seawall to withstand a major earthquake.

The *San Francisco Marina Renovation Project Breakwater Improvement Study*, included in Appendix C, was conducted to evaluate the potential effects of proposed breakwater construction on sedimentation and erosion rates both on and off the site; the attenuation of wave energy; potential effects on the adjacent Fort Mason structures due to reflected wave energy; and circulation within the harbors. The assumptions and conclusions of the study were peer-reviewed for accuracy by an independent engineering firm. The study recommended that preconstruction quantitative modeling be conducted on the final breakwater designs to ensure that the breakwater structures would perform as intended. Final designs of the breakwaters have not yet been determined. If preconstruction quantitative modeling of the breakwater designs were not conducted as recommended in the study, it is possible that the breakwaters might not perform as intended, with unknown onsite and offsite effects. Completion of the breakwaters without such modeling would be a significant impact. This recommendation has been reiterated in this EIR as Mitigation Measure GEO-3 (see p. S-20).

Computer wave modeling included in the study indicated that current velocities and wave energy would generally be decreased adjacent to the seawalls as a result of the proposed breakwaters, making them less susceptible to damage from wave action. Therefore, the project would not have an adverse impact on the seawalls from increased wave energy. Wave modeling concluded that construction of the proposed breakwaters in the West Harbor would reduce the height of the northeast wind-wave by up to 50 percent along the Fair's Seawall and 10 percent within the inner harbor, with no change in wave height adjacent to the Marina Boulevard Seawall. The height of the northeast wind-wave would be increased by up to 10 percent along the north side of the outer jetty, including the eastern tip, and along the Fair's Seawall east of the proposed breakwaters. A 10 percent change in wave height is equal to approximately 2.5 inches, which is considered within the accuracy of the model. This relatively small change in wave height would not have a significant impact on the structural integrity of the seawall.

With construction of the floating breakwater in the East Harbor, northeast wind-waves would be reduced by up to 50 percent. Very little wave energy from northwest waves would enter this harbor. The longer-period swells of the northwest wave would be expected to pass unaffected under the floating breakwater. Although it would be possible to attain more wave protection in the East Harbor with a solid breakwater design, such as rock-filled or sheetpile, there would be greater reflection of wave energy towards Fort Mason's Pier 1. As such, these other breakwater designs were rejected in favor of the floating type, which would meet the wave reduction performance requirements without substantial offsite impacts.

The proposed project would have a significant impact if it caused changes in wave propagation patterns that could damage Pier 1's structure, making it more susceptible to failure or damage in

the event of a major earthquake. Numerical modeling demonstrated that, while construction of the floating breakwater at the East Harbor would increase wave forces on this structure due to reflected waves, including during storm events, these forces would be well within the limits that the Pier 1 structure can withstand, even in its weakened condition.

It is also possible that vibrations from installation of the piles for the East Harbor breakwater could damage the Fort Mason structures or induce liquefaction of the surrounding soil. Repairs to Piers 1 and 2 at Fort Mason have included pile driving through the deck of the piers, very close to existing structures, without any effects on these structures. Regardless, the project sponsor would require a geotechnical investigation in the area where the piles would be installed and would conduct a pile design analysis during the design phase of the project, as recommended in the Breakwater Improvement Study and reiterated here as Mitigation Measure GEO-4 (see p. S-20). With implementation of this measure, including a test pile program if warranted by the results of the pile design analysis, vibration monitoring of Pier 1 if warranted, and stopping of pile driving should vibrations exceed an acceptable level, potential vibration-related impacts at Pier 1 would be less than significant.

Access required by the National Park Service to make planned future repairs to Pier 1 could be impeded by the proposed East Harbor breakwater because it would be located about 10 to 20 feet from Pier 1, making it difficult to use larger pile-driving or other construction equipment. However, because the floating breakwater would use a guide-pile system (with pilings spaced a minimum of 20 feet apart) and could be disconnected from these piles relatively easily, construction access to Pier 1 would not be impeded to the extent that these future repairs could not be performed. Regardless, the project sponsor would work with the National Park Service regarding construction schedules to ensure that improvements to the Fort Mason structures are coordinated with installation of the floating breakwater, as recommended in the Breakwater Improvement Study and reiterated in Mitigation Measure GEO-5 (see p. S-21). Implementation of this measure would reduce potential interferences with construction activities at Pier 1 to less than significant.

The Breakwater Improvement Study evaluated whether the project could alter sedimentation and coastal erosion patterns at offsite locations such as Crissy Field. Numerical modeling performed to evaluate sediment transport patterns predicted that potential effects on sedimentation and erosion rates would be limited to the immediate vicinity of the new breakwaters and would not affect offsite locations, including the area “up-coast” of the marina between the Golden Gate and the West Harbor, including Crissy Field. Because of their alignment and location, the proposed breakwater segments would not interrupt the east-west movement of sand during northeast storms, and therefore would not contribute to additional sand transport in either a west or an east direction. Therefore, impacts related to offsite sedimentation and erosion would be less than significant.

HYDROLOGY AND WATER QUALITY (p. III.E-1)

This section discusses potential water quality impacts related to construction and maintenance dredging and disposal of sediments from the East Harbor, some of which contain elevated levels of contaminants. Maintenance dredging and disposal of sediments in the West Harbor was determined to have a less-than-significant impact to water quality (see Initial Study, Appendix A) and was therefore not addressed in the EIR.

The East Harbor sediments have been sampled on five occasions between 1994 and 2000 for dredge disposal characterization. The results of sediment sampling indicated that some of the East Harbor sediments would not be acceptable for in-Bay disposal, primarily due to the presence of polynuclear aromatic hydrocarbons (PAHs) at concentrations greater than 5 milligrams per kilograms (mg/kg), which is the accepted threshold for in-Bay disposal of these contaminants. One sample of the sediments that would be dredged for the project had a PAH concentration of 2,961 mg/kg. Dredged sediments with PAH concentrations greater than 5 mg/kg would require upland disposal. The sampling data were used to evaluate the volume of sediments that would require upland disposal and the volume that would be suitable for in-Bay disposal. Based on the sampling and the proposed dredging depths, approximately 17,500 cubic yards of sediment contain PAH concentrations greater than 5 mg/kg and would require upland disposal, while 76,000 cubic yards of sediment would be suitable for in-Bay disposal. The dredging and disposal of additional sediments other than the estimated amounts described above could be required in accordance with regulatory requirements identified during the permitting process.

The Regional Water Quality Control Board (RWQCB) and the U.S. Environmental Protection Agency (U.S. EPA) are responsible for determining appropriate dredged material testing and discharge standards, and for assuring that dredging and the disposal of dredged materials are consistent with the maintenance of Bay water quality. The Dredged Material Management Office (DMMO) has also published guidance on sediment disposal testing

Dredged materials that are not suitable for unconfined aquatic disposal but are not classified as a hazardous waste may be disposed of at an upland facility or put to upland beneficial reuse, including (among many possible uses) wetlands creation, habitat restoration, levee restoration, construction fill, or daily landfill cover. There are six multi-user upland/wetland/reuse sites in the Bay Area that accept dredged sediments from a variety of projects. These sites include Carneros River Ranch, Winter Island, Montezuma Wetlands, Van Sickle Island, Port Sonoma, and the eastern portion of the San Francisco Bar Channel Site. Each of these sites has individual acceptance criteria for dredged sediments, depending on permit requirements.

Proposed dredging activities in the East Harbor would result in the short-term disturbance of localized Bay sediments, some of which contain elevated levels of PAHs. As is typical for dredging projects, construction dredging of Bay sediments could adversely affect water quality by temporarily resuspending sediments, thereby increasing turbidity. In addition, chemicals such as PAHs that are present in the sediments could be released to the water column during resuspension, which could temporarily degrade water quality. Dredging could also expose deeper

sediments with higher concentrations of PAHs to the water column, which could result in long-term degradation of water quality.

Normal circulation and tidal effects in the Bay would generally disperse and dilute the water temporarily affected by construction activities. Therefore, only temporary water quality impacts related to suspended solids in the water column would be expected, and impacts to water quality due to resuspension of sediments would be less than significant.

However, because these sediments contain PAHs, water quality in the East Harbor could be temporarily degraded during construction dredging, resulting in a potentially significant, but temporary, impact to water quality. To further reduce potentially significant water quality impacts to a less-than-significant level, the project sponsor would implement Mitigation Measure HYDRO-1 (see p. S-21). This measure would control the dispersion of sediments during construction activities and would restrict the area subject to these temporary effects. Equipment used for dredging and for placement of the cap would be modified or specifically designed to control the dispersion of sediments and achieve precise control over the depth and area of sediment removal. Automatic systems could be used to monitor turbidity and other water quality conditions in the vicinity of the dredging operations and would allow for real-time adjustments by the dredging operators to control temporary water quality effects. Another measure could include the use of silt curtains to reduce dispersal beyond the dredge site. The specific measures would be selected on the basis of additional sampling that would be conducted to characterize the sediments during the permitting process. Although the measures would be subject to U.S. Army Corps of Engineers (ACOE) approval, these measures are included as a mitigation measure because they are more stringent than the standard requirements for dredging of sediments. With implementation of the required measures, water quality impacts related to dredging of sediments containing PAHs would be less than significant.

In addition, an engineered cap of clean fill would be installed to isolate contaminated sediments from the water column once dredging has been completed. The cap would likely be required as part of the dredging permit issued for the project. Regardless, to further reduce the potential for significant water quality impacts, the project sponsor would implement Mitigation Measures HYDRO-2 and HYDRO-3 (see p. S-21 and S-22). As specified in Mitigation Measure HYDRO-2, the cap would be designed in accordance with applicable engineering criteria and subject to review and approval by the RWQCB. Once the cap is in place, the project sponsor would implement a monitoring program, as specified in Mitigation Measure HYDRO-3, to ensure that the contaminated sediments remain in place as intended, that the cap material is placed correctly and uses the appropriate materials, and that the cap is effective in isolating the contaminated sediments. A detailed monitoring plan, subject to RWQCB approval, would also be prepared during the design phase of the project in accordance with Mitigation Measure HYDRO-3. Implementation of these mitigation measures would reduce potentially significant water quality impacts to a less-than-significant level.

HAZARDOUS MATERIALS AND WASTE (p. III.F-1)

This section of the EIR focuses on potential hazardous materials impacts related to dredging and disposal of contaminated sediments from the East Harbor; potential impacts related to the use of or exposure to other hazardous materials was found to be less than significant (see Initial Study, Appendix A, for more detail). As discussed above and in Section III.E, Hydrology and Water Quality, sediments from the area of the East Harbor that would be dredged are known to contain elevated levels of PAHs requiring upland disposal at a permitted facility. Dredging and disposal of these sediments could potentially result in exposure of people or the environment to elevated levels of PAHs, unless appropriate planning and control/mitigation measures are implemented.

Disposal methods for sediments excavated from the East Harbor would be determined based on the results of sampling conducted in accordance with a sampling and analysis plan, to be approved by the DMMO. Disposal at an upland facility could require drying at a rehandling facility (subject to a waste discharge permit), where sediments would be off-loaded, dewatered, and dried prior to transportation to the final upland disposal site.

The project sponsor would require the disposal contractor to prepare a dredged material disposal plan specifying methods to segregate sediment for disposal, appropriate disposal methods for sediments, approved disposal sites, written documentation that the disposal site will accept the sediment, procedures and requirements for loading and off-loading sediments to reduce the potential for spillage, and a cleanup plan specifying procedures to be followed if a release occurs. Preparation of a dredged material disposal plan, as specified in Mitigation Measure HAZ-1 (see p. S-22), is included to facilitate planning for specific disposal methods.

During dredging and rehandling of sediments, workers and the public could be exposed to PAHs in the sediment through direct contact or indirect ingestion. Workers and the public could also inhale airborne dust during the handling of dried sediments. Without proper precautions, the handling of dredged sediments could create a potentially significant impact. To provide for worker and public health and safety, the project sponsor would require the contractor to prepare a health and safety plan for dredging operations, as specified in Mitigation Measure HAZ-2 (see p. S-22).

Compliance with the dredging permit; compliance with the RWQCB water quality certification, waste discharge requirements; and implementation of recommended site safety measures and appropriate disposal of dredged materials would ensure that hazardous materials and waste impacts related to disposal of East Harbor sediments would be less than significant.

C. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

On October 27, 2004, the Planning Department held a public scoping meeting to receive public input on the proposed project. Individuals and agencies that received notice of the public scoping meeting included owners of properties within 300 feet of the project site; tenants of the project site, including boat owners; tenants of properties adjacent to the project site; and other potential

interested parties, including various regional and state agencies. On March 19, 2004, the Planning Department published a Notice of Preparation and an Initial Study, which were made available to these same individuals and agencies. Comments and concerns about the proposed project that were raised during the public involvement efforts included: clarity of the project description; the project's consistency with plans and policies; the project's visual and aesthetic compatibility with existing marina structures and views from the adjacent Golden Gate National Recreation Area; the project's effect on circulation and parking in Lower Fort Mason and in the Marina District; the project's effect on adjacent historic resources; dredging operations; construction noise; air emissions; nighttime lighting; sedimentation; risk of fuel spills; and cumulative impacts. Public comments and concerns are addressed either in Chapter III, Environmental Setting and Impacts, of this EIR, or were addressed in the Initial Study, included in Appendix A of this EIR.

Public comments received during the scoping process on environmental topics contained in the Initial Study are addressed in Chapter V, Other CEQA Topics. These comments relate to construction trip traffic, effects of changes in parking rates and use of the trailered boat parking area on neighborhood parking, construction timing of proposed Pier 1 renovations, operational noise from the renovated boat hoist, limits on pile-driving construction periods, and effects of increased electrical consumption from larger boats.

D. MITIGATION MEASURES (p. IV-1)

HISTORIC RESOURCES

HIST-1 The San Francisco Department of Public Works shall ensure that the new West Harbor breakwater and associated Americans with Disabilities Act-compliant ramps are designed in accordance with the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings (Standards)*, so as to avoid damage or substantial alterations to the cobblestone façade of the Fair's Seawall and nearby stone staircase. The Carey & Co. analysis concludes that there are feasible design solutions to all outstanding and unresolved design issues which would comply with the *Standards*, even though the project sponsor does not yet have a final design. For example, a design consistent with the *Standards* would include a new breakwater and access ramps that, if removed in the future, would not damage the seawall structure or its cobblestone facing. The breakwater should also be compatible with (in terms of materials, massing, and scale), yet clearly differentiated from, the seawall (in terms of design). An additional review for compliance with the *Standards* shall take place during the design development stage of the design process. Like the initial determination report, a subsequent report by a historic preservation consultant will be submitted to the Planning Department's Preservation Technical Specialist for review and comment on the proposed breakwater design to assure project compliance with the *Standards*.

HIST-2 The San Francisco Department of Public Works shall ensure that renovations to the Harbor Office are consistent with the *Standards*, so as to avoid substantial alterations to this potentially eligible historic resource. The Carey & Co. analysis concludes that there are feasible design solutions to all outstanding and unresolved design issues which would comply with the *Standards*, even though the project sponsor does not yet have a final design. For example, a design consistent with the *Standards* should strive to retain the original front doorway to the Harbor Office to the extent possible. This door could be sealed shut and obscured from the interior, yet be visible from the exterior. The design should also retain all original multi-pane wood-frame windows on the west- and north-facing elevations. The windows on the north-facing elevation could be sealed shut and obscured from the interior, yet be visible from the exterior, to meet the privacy objectives of the project. Finally, the recessed entrance on the eastern side of the building should be retained, unless determined infeasible, in which case these areas should be infilled with basalt cobblestones that are complementary to the cladding found throughout the building.

An additional review for compliance with the *Standards* shall take place during the design development stage of the design process for the Harbor Office. Like the initial determination report, a subsequent report by a historic preservation consultant will be submitted to the Planning Department's Preservation Technical Specialist for review and comment to assure project compliance with the *Standards*.

SOILS, GEOLOGY, AND SEISMICITY

GEO-1 The project sponsor shall prepare a geotechnical report in compliance with the California Seismic Hazards Mapping Act and the San Francisco Building Code prior to the renovation of the former Deguassing Station. The geotechnical report shall identify seismic hazards and recommend measures to reduce the risk of seismic hazards to an acceptable level. Because of the high potential for liquefaction to occur in this location, the project sponsor should prepare a quantified analysis, including collection of subsurface information from trenches or borings and geotechnical laboratory testing to evaluate the potential for liquefaction. The final building plans would incorporate the recommendations of the geotechnical report, and the project sponsor shall obtain review by the DBI prior to construction. The renovations shall not be approved unless the following minimum criteria have been met:

- The nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate measures have been proposed. Technically achievable measures that could be incorporated into the building design may include construction of a concrete mat foundation or a "grade beam" foundation system that would allow the building to "float" without substantial structural damage in the event of earthquake-induced liquefaction.

- The geotechnical report has been prepared by a registered civil engineer or certified engineering geologist with competence in the field of seismic hazard evaluation and mitigation. The geotechnical report shall contain site-specific evaluations of the seismic hazard affecting the Degaussing Station, identify portions of the project site containing seismic hazards, and identify any known offsite seismic hazards that could adversely affect the building in the event of an earthquake.
- The lead agency (the DBI for this project) has independently reviewed the geotechnical report to determine the adequacy of the hazard evaluation and proposed measures to reduce identified seismic hazards. The review shall be conducted by a certified engineer with competence in the field of seismic hazard evaluation and mitigation.

Review of the building permit application and geotechnical report by DBI and construction management oversight by the project sponsor as a condition of project approval would ensure that the recommendations of the geotechnical report are appropriately implemented.

GEO-2 The Fair's Seawall shall be visually inspected where the mole at the foot of Scott Street would be removed, and toe protection similar to existing conditions on the remainder of the seawall shall be installed to protect this newly exposed section of the seawall from damage. Structural investigations shall be conducted in the vicinity of the mole removal on a periodic basis, and identified structural defects shall be repaired promptly.

- GEO-3 The project sponsor shall require quantitative modeling for the final design of the breakwater structures to ensure that the breakwaters will perform as intended to protect the harbors from wave action and will not negatively affect Pier 1 and its associated structures. The modeling shall ensure that the project meets the following performance standards: for the East Harbor, a minimum of 50 percent reduction of the design wave for waves from the northeast, and no more than 20 percent increase in design wave height at the Pier 1 piles due to reflection of northeast waves off the floating structure. For the West Harbor, a maximum wave height of 0.5 feet at the berths and the seawall. The quantitative analysis could include collection of field data; structural and geotechnical engineering; physical and/or numerical modeling; and sediment characterization. Monitoring required to measure the potential effects of the project would include periodic visual inspections for evidence of cracks, scour, or other forms of damage. Identified structural defects shall be repaired promptly by the City. The monitoring program to assess impacts to Pier 1 shall be subject to independent review and closely coordinated between the project sponsor and the National Park Service to ensure agreement on data (including structural baseline information), methods, results and overall duration of the program.

GEO-4 The project sponsor shall require a geotechnical investigation in the area where the piles for the East Harbor breakwater would be installed, and prepare a pile design analysis to further evaluate the potential pile types and the effects of pile driving. The analysis would be performed to determine if an alternative pile type (such as an open

- steel pipe instead of concrete or an enclosed system) or installation method (such as predrilling, water-jetting, or using resonance-free vibratory hammers) would minimize vibration and/or liquefaction hazards. If warranted by the analysis, a test pile program shall be conducted to measure underwater vibration as well as piling deflections. If alternative pile types or installation methods would not be effective in minimizing vibration and/or liquefaction hazards, the project sponsor shall conduct vibration monitoring of Pier 1 and associated structures. If construction vibration exceeds an acceptable structural threshold, which shall be designed to assure that vibration from pile-driving does not weaken the structural integrity of Pier 1, pile-driving activities shall cease until an alternative plan can be devised. If no additional alternative pile type or installation methods exist beyond those discussed above to reduce the vibration from pile driving to an acceptable level, the breakwater in the East Harbor shall be constructed after structural improvements to Pier 1 have been completed. The pile design analysis, including a test pile program, shall be subject to independent review and closely coordinated between the project sponsor and the National Park Service to ensure agreement on acceptable vibration thresholds for Pier 1, as well as the alternative pile type or installation methods. The project sponsor shall accept responsibility for the prompt repair of Pier 1 if pile driving activities in the East Harbor were to unintentionally damage this structure.
- GEO-5 The project sponsor shall construct the floating breakwater at the East Harbor using a guide-pile system that would allow for disconnection of the float from the piles, and shall accept responsibility for assembly/disassembly in the event that such measures are necessary for access to Pier 1, or any damage that may result from such activities. The project sponsor shall also coordinate with the National Park Service regarding the construction schedule and design for the East Harbor breakwater. Construction activities shall be phased if needed to facilitate access to Pier 1 for the planned repairs and improvements by the National Park Service. The project sponsor shall also investigate whether the East Harbor breakwater could be designed and constructed concurrently with NPS's Pier 1 seismic upgrade project, to ensure compatibility between the two structures.

HYDROLOGY AND WATER QUALITY

- HYDRO-1 During dredging and placement of the cap, the project sponsor shall require that the contractor(s) employ measures to control dispersion of contaminated sediments. Equipment used for dredging and placement of the cap shall be modified or specifically designed to control the dispersion of sediments and achieve precise control over the depth and area of sediment removal. In addition, the operations could use automatic rather than manual monitoring of the dredging operations, which would allow continuous data logging with automatic interpretation and automatic adjustments to the dredging operations for real-time feedback for the dredge operator. Automatic systems could also be used to monitor turbidity and other water quality

conditions in the vicinity of the dredging operations and allow real-time adjustments by the dredging operators to control temporary water quality effects. Another measure could include the use of silt curtains to reduce dispersal beyond the dredge site, if appropriate. The specific measures to be implemented would be selected on the basis of additional sampling that would be conducted to characterize the sediments and would be subject to approval by the ACOE, RWQCB, and other regulatory agencies during the permitting process.

HYDRO-2 The project sponsor shall install a cap over the contaminated sediments; the cap shall be designed in accordance with applicable engineering criteria and subject to RWQCB review and approval.

HYDRO-3 The project sponsor shall implement a monitoring program(s) to ensure that the contaminated sediments remain in place, that the cap material is placed correctly and uses the appropriate materials, and that the cap is effective in isolating the contaminated sediments. A detailed monitoring plan describing the monitoring program shall be prepared during the design phase of the project and would require approval from the RWQCB.

HAZARDOUS MATERIALS AND WASTE

HAZ-1 The project sponsor shall require the dredging contractor to prepare a dredged material disposal plan specifying methods to segregate sediment for disposal, appropriate disposal methods for sediments, an approved disposal site, written documentation that the disposal site would accept the sediment, procedures and requirements for loading and off-loading sediments to reduce the potential for spillage, and a cleanup plan outlining procedures to be followed if a release occurs. The contractor would be required to submit the plan to the project sponsor for acceptance and to the NPS for review and input prior to implementation. The plan might also be subject to regulatory approval, and if so, the project sponsor shall require the contractor to comply with all regulatory requirements.

HAZ-2 The project sponsor shall require the dredging contractor to prepare and implement a site health and safety plan that would identify the chemicals present, potential health and safety hazards, monitoring to be performed during site activities, sediment handling methods required to minimize the potential for exposure to harmful levels of chemicals identified in the sediment, appropriate personnel protective equipment, and emergency response procedures. The plan shall be provided to the project sponsor and NPS for review and input.

E. IMPROVEMENT MEASURE

HIST-1 – East Harbor Design Guidelines

In order to maintain the distinctive industrial maritime character of the San Francisco Port of Embarkation Historic Landmark District, the project sponsor shall work with the National Park Service/Golden Gate National Recreation Area (NPS/GGNRA) to implement the *East Harbor Design Guidelines*, provided in Appendix B. These guidelines, developed in collaboration among the NPS/GGNRA, the San Francisco Department of Public Works, and the preservation architecture firm Carey & Co., are intended to guide the design of proposed East Harbor elements in terms of materials, scale, texture, site relationships, color, architectural character, and views. The guidelines are consistent with the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings* and take into account the unique maritime-industrial character of Lower Fort Mason.

- **VIZ-1 – Location of the Maintenance Building**
- Select a location for the maintenance building that maximizes both preservation of the existing open space and protection of existing views. Work with the community to identify the preferred location for the structure.

- **OTHER-1 – Bay Trail Signage in the East Harbor**
- Provide signage or other directional materials as appropriate to indicate the location of the Bay Trail alignment on the marina property, particularly in the East Harbor area. Coordinate with the San Francisco Bicycle Coalition, the National Parks Service, the Fort Mason Foundation, Bay Trail project staff, and other appropriate interested parties in efforts to improve conditions for Bay Trail users on marina property, particularly in the East Harbor area.

F. MITIGATION MEASURES FROM INITIAL STUDY

Mitigation Measure 1 – Noise

The project sponsor shall require the construction contractor(s) to use state-of-the-art noise shielding and muffling devices on pile-driving construction equipment and limit pile-driving activity to the hours between 7:00 a.m. and 3:30 p.m.,⁵ Monday through Friday. The construction contractors shall notify residences fronting Marina Boulevard, from Baker Street to Casa Way and from Webster Street to Laguna Street. Businesses at Fort Mason Center shall also be notified prior to the start of construction. The notification shall provide the approximate times of construction and a phone number for any additional questions about construction, or to register complaints regarding construction activities, including noise levels. Pile-driving activities in the East Harbor shall cease during scheduled daytime events at Fort Mason Center. The San Francisco Department of Public Works shall also coordinate pile-driving construction schedules in the East Harbor with Fort Mason and its proposed renovations to Pier 1. Coordination shall include meetings, phone calls, or other discussions with Fort Mason Center, to be initiated by the San Francisco Department of Public Works, prior to finalization of the City's construction schedule for the proposed East Harbor breakwater.

Other measures to reduce noise associated with pile-driving activities shall include the following:

- Implement “quiet” pile-driving technology (such as pre-drilling of piles, water-jetting, resonance-free vibratory hammers, and the use of more than one pile-driver to shorten the total pile-driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions.
- Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings such as Building A at Fort Mason, such as the installation of noise-absorbent baffling or other barrier-type material to be placed at strategic locations on the western side of Building A.

Mitigation Measure 2 – Construction Air Quality

The following control measures recommended by the Bay Area Air Quality Management District shall be implemented during construction:

- All exposed soils shall be watered at least twice daily during construction. Watering shall be sufficient to prevent airborne dust from leaving the site. Increased watering frequency shall occur, as necessary, whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used for site watering, if available.

⁵ Since publication of the Initial Study on March 19, 2005, the NPS/GGNRA has requested that pile driving cease at 3:30 p.m. instead of 8:00 p.m., as was originally published. In addition, the prohibition of pile driving from 11:30 a.m. to 1:30 p.m. has been eliminated to allow for at least eight hours of construction work per day. This revised construction schedule has been accepted by the project sponsor and would be implemented.

- All trucks hauling soil, sand, and other loose materials shall be covered, or at least 2 feet of freeboard shall be maintained (i.e., the minimum required space between the top of the load and the top of the trailer).
- All paved access roads, parking areas, and any paved areas used for staging shall be swept daily (using reclaimed water, if possible).
- At the end of each day, if visible soil material is carried onto nearby paved roads, streets shall be swept (using reclaimed water, if possible).
- Construction vehicles shall use paved roads to access the construction site wherever possible.

Mitigation Measure 3 – Environmental Site Assessments and Health and Safety Plan

Prior to the start of construction, the project sponsor would retain a qualified professional (e.g., a California-registered environmental assessor) to conduct a Phase I environmental site assessment for the landside areas of the proposed project site. The assessment would conform with standards adopted by the American Society for Testing and Materials for Phase I environmental site assessments and would identify land uses that currently or historically have stored or generated hazardous materials and evaluate whether releases of hazardous materials have occurred that could affect soil or groundwater quality at the site. The assessment would include recommendations for further investigation of the site, if necessary.

If the Phase I environmental site assessment were to indicate that a release of hazardous materials could have affected soil quality at the site, the project sponsor would retain a qualified environmental professional to conduct a Phase II environmental site assessment to assess the presence and extent of contamination at the site, in conformance with state and local guidelines and regulations.

If the sampling identifies surface and/or subsurface contamination in areas subject to ground disturbance during construction, the area would be remediated in accordance with the standards, regulations, and determinations of local, state, and federal regulatory agencies. The project sponsor would coordinate with the San Francisco Department of Public Health and any other applicable regulatory agencies to adopt contaminant-specific remediation target levels. The excavated soil would be removed and disposed of at an approved disposal facility.

All reports and plans prepared in accordance with this mitigation measure shall be provided to the San Francisco Department of Public Health and to any other appropriate agencies identified by the Department of Public Health. When all hazardous materials have been removed from existing buildings, and soil and groundwater analysis and other activities have been completed, as appropriate, the project sponsor shall submit to the San Francisco Planning Department and the Department of Public Health (and any other agencies identified by the Department of Public Health) a report stating that the mitigation measure has been implemented. The report shall describe the steps taken to comply with the mitigation measure and include all verifying

documentation. The report shall be certified by a registered environmental assessor or similarly qualified individual who states that the mitigation measure has been implemented, and specifying the actions that have been implemented.

Potential hazards to construction workers and the general public associated with exposure to hazardous materials in soils or groundwater during construction would be mitigated by the preparation and implementation of a site-specific health and safety plan. The health and safety plan would meet the requirements of federal, state, and local environmental and worker safety laws. Specific information to be provided in the plan includes identification of contaminants, potential hazards, material handling procedures, dust suppression methods, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment to be used during construction to verify health and safety of the workers and the public, measures to protect public health and safety, and emergency response procedures.

Mitigation Measure 4 – Archaeological Resources

The following mitigation measure is required to avoid potential adverse effects due to the accidental discovery of buried or submerged historical resources, as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archaeological resource ALERT sheet to the prime contractor; to any subcontractor(s) (including firms hired to perform demolition, excavation, grading, foundation, pile driving, etc.); and to any utilities providers involved in soil- or Bay-bottom-disturbing activities at the project site. Prior to any soil- or Bay-bottom-disturbing activities, each contractor is responsible for circulating the ALERT sheet to all field personnel, including machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities providers) confirming that all field personnel have received copies of the ALERT sheet.

In the event that evidence of an archaeological resource is encountered during soil- and Bay-bottom-disturbing activities, the head foreman and/or project sponsor shall immediately notify the ERO and shall suspend soil- or Bay-bottom-disturbing activities in the vicinity of the discovery until the ERO, in consultation with the California State Lands Commission (CSLC), has determined what additional measures should be undertaken.

If the ERO, in consultation with the CSLC, determines that an archaeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archaeological consultant. The archaeological consultant shall advise the ERO as to whether the discovery is an archaeological resource, retains sufficient integrity, and is of potential scientific, historical, or cultural significance. If an archaeological resource is present, the archaeological consultant shall identify and evaluate the resource. The consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO, in consultation with the CSLC, may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include in-situ preservation of the archaeological resource or an archaeological evaluation program. If an archaeological evaluation program is required, it shall be consistent with the Major Environmental Analysis division of the Planning Department guidelines for such programs.

The project archaeological consultant shall submit a Final Archaeological Resources Report (FARR) to the ERO and the CSLC that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate, removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO and the CSLC for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey, Northwest Information Center shall receive one copy, and the ERO shall receive one copy of the FARR. The Major Environmental Analysis division and the CSLC shall receive two copies of the FARR, along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation pertaining to NRHP/CRHR eligibility. In instances of high public interest or interpretive value, the ERO and the CSLC may require a different final report content, format, or distribution than those presented above.

G. IMPROVEMENT MEASURES FROM THE INITIAL STUDY

The project sponsor intends to implement the following improvement measures. These measures were identified in the Initial Study (see Appendix A).

Improvement Measure 1 – “Dry Firing” During Pile Driving

Prior to any pile driving, contractors shall “dry fire” before commencing pile driving if marine mammals are identified within 150 feet of the work area. The U.S. Coast Guard Pier in Monterey, California, has employed dry firing to “herd” California sea lions away from worksites during the installation of piles. A dry fire occurs when the hammer is raised and dropped without compressing the pistons, which produces approximately 50 percent of the maximum in-air noise level. This technique allows pinnipeds to voluntarily move from the area before the hammer is operated at full capacity, and should expose fewer animals to loud sounds both underwater and above water.

Improvement Measure 2 – Public Education Activities

The project sponsor shall conduct public education activities to inform people of harbor rules and the importance of protecting water quality within the marina. As part of this program, signs shall be posted at locations accessible to marine tenants and the visiting public. The signs shall describe the locations and encourage the use of sewage and restroom facilities, oily water pumpout facilities, and the used oil and oil-filter recycling kiosk. The program shall educate

tenants about potential water quality impacts related to the use of cleaners, solvents, and paints for boat cleaning and maintenance; encourage tenants to restrict the use of these materials; provide information about more environmentally sound alternatives to the use of these materials; and encourage tenants to minimize underwater hull cleaning and maintenance.

H. ALTERNATIVES TO THE PROPOSED PROJECT

NO PROJECT

DESCRIPTION

This alternative would entail no renovations to or development of the site. Under this alternative, the project setting would remain substantially as it is today. It is possible that the Recreation and Park Department would undertake small-scale repairs at specific locations as needs become critical, but no large-scale renovation would occur.

IMPACTS

The No Project Alternative would result in no substantial changes to the project site. As is the case with the proposed project, the existing variety of recreational and open space uses on the project site would remain. Unlike the project, however, there would be no renovation of either the West Harbor or East Harbor, nor would the former Degaussing Station be renovated and reoccupied as the Harbor Office. With this alternative, there would be no changes to public scenic views or vistas, or any change in views of the marina.

Under the No Project Alternative, marina facilities such as the wood docks, slips, and pilings would continue to deteriorate slowly due to wave action and because the wood materials are well beyond their useful life expectancy, potentially causing a greater safety hazard than would exist compared to the proposed project.

The No Project Alternative would avoid or reduce nearly all of the potentially significant impacts associated with the proposed project, including alterations to the potentially historic Harbor Office, exposure to seismic risk in connection with reoccupancy of the former Degaussing Station, and geologic and historic resource impacts related to removal of the north-south mole from the Fair's Seawall. Thus, no mitigation measures to reduce these effects would be required under the No Project Alternative. This alternative would also not result in any impacts related to wave action, vibration from pile driving, or construction access to Pier 1 resulting from construction of new breakwaters that would occur under the proposed project, and no mitigation for these impacts would be required.

Unlike the proposed project, this alternative would not result in disturbance of contaminated sediments in the East Harbor, and therefore this alternative would have no temporary construction-related effects on water quality. The No Project Alternative, unlike the proposed project, would not result in installation of an engineered cap of clean fill to isolate contaminated

sediments from the water column following the completion of dredging. With no dredging, this alternative would not expose people or the environment to elevated levels of PAHs. However, this alternative would not result in long-term improvements to water quality in the East Harbor as compared to the proposed project.

This alternative would also avoid the operational and construction impacts described in the Initial Study, such as construction-related traffic, noise, and air quality impacts; incremental changes (both increases and decreases) in operational emissions from vessels; effects on fish, marine mammals, and aquatic habitat; and effects on archaeological resources. Unlike the proposed project, the No Project Alternative would not require mitigation for the following significant impacts identified in the Initial Study: generation of construction-period noise and vibration; construction air quality impacts; potential exposure to landside hazardous materials, including PCBs; and potential accidental discovery of archaeological artifacts. Unlike the proposed project, the No Project Alternative would not include Improvement Measure 1 from the Initial Study (“dry firing” during pile driving to alert marine mammals), nor would it include Improvement Measure HIST-1 (*East Harbor Design Guidelines*), as these would no longer apply. However, the project sponsor might still implement Improvement Measure 2 from the Initial Study (conduct public education activities to inform people of harbor rules and the importance of protecting water quality within the marina).

COMPLIANCE WITH PROJECT SPONSOR’S OBJECTIVES

The No Project Alternative would not comply with any of the project sponsor’s objectives, including objectives #1: provide a safer, more modern marina with a longer useful life; #2: protect marina structures from locally generated wind-waves from the north and northeast directions; #3: provide a slip size distribution that more closely matches market demand; #4: expand and modernize the Harbor Office and relocate the Harbor Office to a site proximate to both the West and East Harbors; and #5: better serve marina tenants as well as the general public by providing new and improved facilities, including new docks and walkways, and new publicly accessible walks at the East Harbor; new and upgraded toilet facilities and showers (including new disabled access); new and repaired boat launch facilities at both harbors and a refurbished guest dock at the West Harbor; upgraded facilities for boat sewage pumpout; and enhanced landscaping.

NO NEW WEST HARBOR BREAKWATERS

DESCRIPTION

Alternative B would include all project components with the exception of the two new breakwaters proposed at the mouth of the West Harbor under the proposed project. The existing moles at the foot of Scott Street would also remain in place. This alternative would include construction of a new floating breakwater at the East Harbor, as well as renovated boat slips in both harbors, the renovation of the former Degaussing Station to serve as the Harbor Office, improvements to and expansion of restrooms and tenant showers, repair of the East Harbor boat

hoist, construction of a new maintenance building, improved public access, and all other components of the proposed project.

IMPACTS

Most impacts under Alternative B would be the same as those described for the proposed project, with the primary exceptions related to visual quality, historical resources, and geology, soils, and seismicity. As this alternative would not construct new breakwaters in the West Harbor, there would be incrementally less visual change than under the proposed project. New docks and slips would be constructed with a similar orientation in the inner harbor of the West Harbor and would contain potentially larger boats, resulting in similar visual changes as the proposed project (as shown in Figure 8B, p. III.B-11, but without the simulated breakwaters). However, the renovated slips and docks in the West Harbor would deteriorate faster than under the proposed project, as they would be unprotected from wind-driven waves from the north and northeast.

The analysis in Section III.C, Historic Resources, found that the southernmost of the two new West Harbor breakwaters could potentially result in an adverse effect on the historic Fair's Seawall. This potential impact would not occur under this alternative, and thus Mitigation Measure HIST-1 would not be required. As planned renovations to the Harbor Office would still occur under this alternative, potential impacts to this historic resource associated with the renovation efforts would remain the same, and thus Mitigation Measure HIST-2 would apply to this alternative as well.

With regard to geology, soils, and seismic impacts, seismic risks associated with reoccupancy of the former Degaussing Station would also occur under Alternative B, and thus Mitigation Measure GEO-1 requiring a geotechnical investigation and report would apply to this alternative. As the existing north-south mole would remain under this alternative, any impacts associated with its removal and exposure of the Fair's Seawall to wave action would not occur. As the design of the East Harbor breakwater for this alternative has not been finalized, it is possible that the breakwater might not perform as intended, with unknown onsite or offsite impacts. Quantitative modeling, monitoring, and repair if necessary, as described under Mitigation Measure GEO-3, would mitigate this impact to a less-than-significant level. Quantitative modeling for breakwaters in the West Harbor would not be required, as these would not be a part of Alternative B.

Like the proposed project, vibration impacts to Pier 1 associated with pile driving for construction of the East Harbor breakwater would occur under Alternative B, as this portion of the project would remain. Impacts associated with construction access to adjacent Pier 1 and coordination of schedules would also occur. Mitigation Measure GEO-5 would reduce these potentially significant impacts to a less-than-significant level.

Like the proposed project, temporary construction impacts to water quality would occur under Alternative B, as dredging of contaminated sediments in the East Harbor would occur. Mitigation Measures HYDRO-1, -2, and -3 would reduce these potentially significant impacts to a less-than-significant level. Impacts associated with dredging and disposal of potentially hazardous dredge

sediments would also occur under Alternative B. Mitigation Measures HAZ-1 and -2 would reduce these potentially significant impacts to a less-than-significant level.

The construction and operational impacts of Alternative B would be generally similar to, but slightly less than, those of the proposed project. The elimination of the West Harbor breakwaters would somewhat reduce the effects associated with noise, air quality, hazardous materials, and archaeological resources compared to the proposed project, but these impacts would remain significant under Alternative B. Mitigation Measures 1, 2, 3, and 4, as described in the Initial Study, would reduce these potentially significant impacts to a less-than-significant level. Although this alternative would only include improvements at the East Harbor, neither the proposed project nor this alternative is expected to result in substantial changes to the use or operation of the overall marina.

Improvement Measures 1 and 2 from the Initial Study (“dry firing” during pile driving, and public education activities) could also occur under Alternative B, as would Improvement Measure HIST-1 (*East Harbor Design Guidelines*).

COMPLIANCE WITH PROJECT SPONSOR’S OBJECTIVES

Alternative B would only partially satisfy the project sponsor’s objectives. This alternative would not fully satisfy objective #1: to provide a safer, more modern marina with a longer useful life, nor objective #2: to protect marina structures from locally generated wind-waves from the north and northeast directions, as only half of the marina (the East Harbor) would be made safer and would be protected from the damaging effects of wind-generated waves. In the West Harbor, while slip and dock improvements would occur, this area would continue to be subject to the damaging effects of wave action. The Department of Boating and Waterways (DBW) strongly recommends the installation of breakwaters in any area subject to damaging wave activity in order to protect the investment that the City and DBW would be making in the renovated marina structures.

This alternative would fully or partially meet objectives #3, #4, and #5, as it would generally provide a slip-size distribution that more closely matches market demand, would renovate both the Harbor Office and the Degaussing Station, and would provide new and improved docks and walkways, publicly accessible walks at the existing East Harbor breakwater, new and upgraded toilet facilities and showers, and new and repaired boat launch facilities at both harbors.

WEST HARBOR RENOVATION ONLY

DESCRIPTION

Under Alternative C, improvements to the West Harbor would proceed as designed under the proposed project, including new breakwaters, renovated slips and docks, and removal of the moles at the foot of Scott Street. Additionally, the Harbor Office would be moved to the former Degaussing Station, and the Degaussing Station building would be renovated, as under the

proposed project. However, under this alternative, no waterside or landside improvements would occur in the East Harbor, including new slips and docks, floating breakwater, public pathway, harbor dredging, boat hoist renovations, restroom upgrades and expansion, or construction of a new maintenance building. It is possible that the Recreation and Park Department would undertake small-scale repairs at specific locations as needs become critical, but no large-scale renovation would occur.

IMPACTS

Impacts associated with Alternative C would be somewhat reduced when compared to those of the proposed project, because construction would be undertaken only at the West Harbor and at the former Degaussing Station, with no work to be done at the East Harbor. For example, because a new East Harbor breakwater would not be constructed, potentially significant impacts associated with geology and soils, such as pile-driving vibrations and construction access issues with Pier 1, would not occur. As no dredging would occur in the East Harbor, there would be no potential to disturb the contaminated sediment at the East Harbor, and potentially significant impacts to water quality would not occur. As no dredging would occur in the East Harbor, the potentially significant impacts associated with dredging and disposal of hazardous materials would also not occur.

However, because Alternative C would not include placement of an engineered cap over the remaining contaminated sediments in the East Harbor, this alternative would not provide the potential long-term improvements to water quality that would result under the proposed project. In addition, the slips and docks in the East Harbor would continue to deteriorate because they would be exposed to 100 percent of the north and northeast waves.

Because Alternative C would also construct a new breakwater that would attach to the face of the Fair's Seawall, potentially significant impacts to this structure as a historic resource would also occur. Mitigation Measure HIST-1 would reduce this potentially significant impact to a less-than-significant level. Similarly, because Alternative C would also include renovations to the Harbor Office, potentially significant impacts to this building as a historic resource would also occur. Mitigation Measure HIST-2 would reduce this potentially significant impact to a less-than-significant level.

Like the proposed project, potentially significant seismic risks associated with reoccupancy of the former Degaussing Station would occur under Alternative C. Mitigation Measure GEO-1 would reduce this potentially significant impact to a less-than-significant level. Similarly, as the existing north-south mole would be removed under Alternative C, the potentially significant impacts associated with exposure to wave action and potential damage would also occur. Mitigation Measure GEO-2 would reduce this potentially significant impact to a less-than-significant level. As the designs of the West Harbor breakwaters for this alternative have not been finalized, it is possible that these breakwaters might not perform as intended. This impact would also be potentially significant under Alternative C. Quantitative modeling, monitoring, and repair if

necessary, as described under Mitigation Measure GEO-3, would mitigate this impact to a less-than-significant level.

Visual changes associated with renovations to the West Harbor would be generally similar to those described in Section III.B, Visual and Aesthetic Resources. No visual changes would occur in the East Harbor, and the area would appear as it does under existing conditions (see Figure 5A, p. III.B-6).

The construction and operational impacts of Alternative C would be generally similar to, but slightly less than, those of the proposed project. The elimination of the East Harbor breakwater would somewhat reduce the effects associated with noise, air quality, hazardous materials, and archaeological resources compared to the proposed project, but these impacts would remain significant under Alternative C. Mitigation Measures 1, 2, 3, and 4, as described in the Initial Study, would reduce these potentially significant impacts to a less-than-significant level. Although this alternative would include improvements at the West Harbor only, neither the proposed project nor this alternative is expected to result in substantial changes to the use or operation of the overall marina.

Improvement Measures 1 and 2 from the Initial Study (“dry firing” during pile driving to alert marine mammals, and public education activities) would also occur under Alternative C; however, Improvement Measure HIST-1 (*East Harbor Design Guidelines*) would not apply, as no changes to the East Harbor would occur under Alternative C.

COMPLIANCE WITH PROJECT SPONSOR’S OBJECTIVES

Alternative C would not fully satisfy the project sponsor’s objective #1: to provide a safer, more modern marina with a longer useful life, nor objective #2: to protect marina structures from locally generated wind-waves from the north and northeast directions, as only half of the marina (the West Harbor) would be made safer and would be protected from the damaging effects of wind-generated waves. In the East Harbor, this area would continue to be subject to the damaging effects of wave action. The DBW strongly recommends the installation of breakwaters in any area subject to damaging wave activity in order to protect the investment that the City and DBW would be making in the renovated marina structures. Objective #3 would be only partially satisfied, as only half of the slips in the West Harbor would have a slip-size distribution that more closely matches market demand, while those in the East Harbor would remain unmatched with market demand. This alternative would meet objective #4, as it would renovate both the Harbor Office and the former Degaussing Station. Alternative C would only partially meet project objective #5, as it would provide new and improved docks and walkways, new and upgraded toilet facilities and showers, and new and repaired boat launch facilities to only one of the harbors. In addition, Alternative C would not provide for enhanced public access because it would not install a public pathway atop the existing East Harbor breakwater.

None of the impacts of this alternative would be more severe than those of the proposed project, and a number of impacts would be less substantial, more so than the other three alternatives.

Therefore, this alternative would be considered the environmentally superior alternative, in accordance with CEQA Guidelines Section 15126.6(e)(2).

REMOVAL OF THE FORMER DEGAUSSING STATION AND EXPANSION OF THE HARBOR OFFICE

DESCRIPTION

Waterside improvements under Alternative D would be the same as those described for the proposed project and would include new breakwaters, slips, and docks in both the East and West Harbors, as well as dredging in the East Harbor. Landside improvements would also be the same as those for the proposed project, except that the former Degaussing Station would not be renovated for use as the Harbor Office, and the existing Harbor Office would be slightly expanded. Under this alternative, the former Degaussing Station would be demolished and the area returned to open space or surface parking. The existing building where the Harbor Office is located would be renovated as under the proposed project. Under this alternative, the building would continue to serve as both the Harbor Office and a public restroom and tenant showers. The existing building would be expanded by 200 to 400 square feet to the east to accommodate disability access upgrades for the restrooms and showers, but the 100 square feet of existing office space that currently serves the harbormaster would remain as is and would not be converted to tenant restrooms and showers.

IMPACTS

Impacts of Alternative D would be the same as those of the proposed project, with the exception of visual, historic, and geologic/seismic impacts. In terms of visual effects, the former Degaussing Station would no longer be visible along the water's edge north of the Marina Green (see Figure 7A, p. III.B-10, but without views of the building), which could be considered a beneficial effect by providing greater public views of the Bay. However, expansion of the Harbor Office by 200 to 400 square feet to the east to accommodate disability access upgrades for the restrooms and showers would be visible from various locations in the West Harbor. The expansion of the existing Harbor Office would only be readily apparent to close-in observers. Because the single-story building has a relatively low profile, the expansion would not be very noticeable, if at all, from mid-range viewpoints, such as that shown in Figure 9A or B, p. III.B-14. This relatively small expansion of an existing building would not likely create a substantial visual impact or block important views from public locations. Visual changes associated with all other components of Alternative D would be generally similar to those described in Section III.B, Visual and Aesthetic Resources.

Depending on the ultimate design of the Harbor Office expansion, this alternative could result in a significant impact to the building's status as a potentially eligible historic resource, as described in Section III.C, Historic Resources. Mitigation Measure HIST-2, requiring compliance with the *Standards* for any expansions and renovations to this building, would reduce this impact to a less-

than-significant level. The former Degaussing Station was not found eligible as a historic resource under CEQA, and therefore its demolition would not result in a significant impact to historic resources.

As the former Degaussing Station would be removed under Alternative D, seismic risks associated with reoccupancy of the building would not occur. However, the existing areawide liquefaction risk would remain the same, with or without the former Degaussing Station.

Removal of the Degaussing Station would have slightly greater construction-related air quality and hazardous materials impacts than the proposed project, such as exposure to asbestos, lead-based paint, and construction dust during building demolition. Demolition of the former Degaussing Station could also result in accidental damage to subsurface archaeological resources, if present in the vicinity. Mitigation Measures 1, 2, 3, and 4 identified in the Initial Study for fugitive dust control, handling procedures for contaminated building waste, and standard measures for accidental discovery of archaeological resources would also reduce the construction-related effects of Alternative D.

As with the proposed project, potentially significant impacts associated with dredging and disposal of contaminated sediment in the East Harbor, construction vibration and access impacts to Pier 1 associated with the East Harbor breakwater, and potential impacts to the Fair's Seawall due to the removal of the north-south mole and construction of the southernmost breakwater in the West Harbor would also occur under Alternative D. Mitigation Measures HIST-1, GEO-2 through -5, HYDRO-1 and -2, and HAZ-1 and -2 would reduce these impacts to a less-than-significant level.

Improvement Measures 1 and 2 from the Initial Study ("dry firing" during pile driving, and public education activities) would also occur under Alternative D, as would Improvement Measure HIST-1 (*East Harbor Design Guidelines*).

COMPLIANCE WITH PROJECT SPONSOR'S OBJECTIVES

Alternative D would meet the project sponsor's objectives with the exception of part of objective #4: expand and modernize the Harbor Office and relocate the Harbor Office to a site proximate to both the West and East Harbors. Alternative D would not relocate the Harbor Office to a site proximate to both the East and West Harbors, but would expand and modernize the existing Harbor Office.

The Recreation and Park Department believes that Alternative D would not be as satisfactory as the proposed project because the existing Harbor Office site is relatively constrained, which could preclude expansion and modernization of the Harbor Office as planned. Alternative D would also eliminate a Harbor Office near both the East and West Harbors. Finally, this alternative would not permit improvement of the West Harbor restrooms/tenant showers, except to improve disabled access, because the space required to meet this project objective was to come from the existing Harbor Office building.

CHAPTER I

INTRODUCTION

This Draft Environmental Impact Report (Draft EIR) has been prepared by the San Francisco Planning Department in accordance with the California Environmental Quality Act (CEQA) to evaluate potentially significant impacts associated with the proposed San Francisco Marina Renovation Project, and to provide mitigation measures to reduce such impacts to a less-than-significant level.

The proposed project was the subject of a Preliminary Mitigated Negative Declaration (PMND) published by the Planning Department on December 27, 2003. Following receipt of several appeals to the PMND, the Planning Department decided to prepare an EIR. On October 8, 2004, a notice of a public scoping meeting was mailed to owners of properties within 300 feet of the project site; tenants of the project site, including boat owners; tenants of properties adjacent to the project site; and other potential interested parties, including various regional and state agencies. On October 27, 2004, the Planning Department held the public scoping meeting to receive public input on the proposed project.

The following comments relevant to environmental review under CEQA were made in the appeals to the PMND:

- The project description did not correctly explain the proposed project and setting (specifically, appellants claimed the Marina Green was improperly excluded from the “project area,” and claimed the Marina Green would be adversely affected; the area of marina expansion was underestimated; the project would expand, not merely renovate, the West Harbor; the adjacent Fort Mason Historic Landmark District was not adequately discussed; and the description of on-land boat storage was inadequate).
- The project would be incompatible with various General Plan and Planning Code provisions, with a Board of Supervisors resolution prohibiting new breakwaters, and with the Recreation and Park Department’s mandate to provide for maximum public access to its facilities.
- The PMND inadequately described land use compatibility with respect to Fort Mason Center (particularly as to construction-related pile driving) and the Marina Green.
- The PMND’s analysis of visual quality did not adequately address compatibility with existing marina structures and views from adjacent locations within the Golden Gate National Recreation Area; the effects of “expanded” shoreline area use in the West Harbor; and the loss of views and other scenic impacts from new docks and breakwaters, larger boats, boats in reoriented slips, and boats stored on trailers.

- The PMND’s transportation/circulation analysis did not adequately analyze effects on Lower Fort Mason or changes in parking demand and traffic.
- The analysis of the impact of construction noise on Fort Mason Center was inadequate.
- The PMND should have discussed potential impacts of the increased number of large, diesel-powered craft in terms of diesel fumes (a source of particulate matter).
- Biological resources effects were not discussed (specifically, effects on “fragile tidal waterways” and effects of nighttime lighting and activity on birds).
- Additional analysis is required regarding the potential effects of off-site sedimentation and siltation. Breakwaters would increase the need for maintenance dredging and cause siltation to occur in areas where siltation currently does not occur. The PMND did not discuss seismic safety of the existing seawalls, nor did it assess the effects of construction of the East Harbor breakwater on Fort Mason’s Pier 1. The PMND should have evaluated the seismic safety of the Degaussing Station.
- The PMND did not adequately address the risk of spills from fueling facilities or the effects of breakwaters on flushing action in the marina, and did not adequately consider effects of hazardous materials in East Harbor sediment.
- The PMND did not adequately analyze cumulative impacts related to the planned Fort Mason Pier 1 seismic retrofit, Crissy Field Marsh Expansion, Tennessee Hollow Restoration, and long-term improvements at Fort Mason Center, nor was there adequate analysis of cumulative impacts associated with the disposal of dredged material. Finally, the PMND should have addressed cumulative impacts of overcrowding (trailer boat towing and storage, public boat dock, hand boat launching, oil recycling kiosk, yacht sales office, and proposed Muni F-Line Extension) in the East Harbor.

The following additional comments relevant to environmental review were made during the public scoping meeting in October 2004:

- Additional lighting for the proposed new Harbor Office and the parking lot would disturb Marina District residents.
- The precise nature of the proposed project was not clear to some speakers.
- The financial feasibility of the project has not been assessed.

Many of these and other concerns voiced by the public were addressed in the Notice of Preparation (NOP) and Initial Study (Appendix A), which were published on March 19, 2005 and distributed to interested parties, regulatory agencies, and neighbors. The NOP/Initial Study indicated that the proposed project could have a significant effect on the environment due to potential dredging, visual quality, historical resource, and cumulative impacts. The NOP/Initial Study indicated that the EIR would address these potentially significant effects. The Initial Study identified a number of environmental topics that would not result in significant impacts with the implementation of mitigation measures included in the Initial Study. Those topics are not analyzed in the EIR, with the exception of Land Use, Plans, and Policies (see Section III.A), which is discussed for informational purposes.

The EIR also addresses relevant comments received during the EIR public scoping period, including:

- Clarification that Fort Mason Center is within the San Francisco Port of Embarkation National Historical Landmark—not the other way around.
- Request that the EIR assess the noise impacts of the renovated boat hoist.
- Request that pile driving for construction of the East Harbor breakwater be restricted to the hours between 7:00 a.m. and 3:30 p.m.
- Clarification that, due to delays in funding, planned renovations to Pier 1 would not likely occur at the same time as the improvements to the East Harbor, and a request that at least 10 feet between the proposed wave attenuation structure and the existing Pier 1 be maintained.
- Request that the EIR quantify construction trip traffic and define peak and nonpeak commute hours.
- Request that the EIR evaluate the proposed fill in light of San Francisco Bay Conservation and Development Commission’s fill policies.
- Clarification that some of the pilings in the harbor were replaced after the 1989 earthquake, and to restate that pilings anchor floating docks, instead of supporting them.
- Request that the EIR address light and glare effects on wildlife.
- Request that the EIR address electrical consumption associated with larger boats.
- Request that the EIR address effects of the expanded East Harbor restroom on open space uses.
- Request that the EIR address effects of changes in parking rates and use of the trailered boat parking area on neighborhood parking.

The comments received during the public scoping process are addressed in this EIR in the applicable sections in Chapter III, Environmental Setting and Impacts. Comments received on environmental topics discussed in the Initial Study are addressed in Chapter V, Other CEQA Topics.

- On May 23, 2006, following publication of the Initial Study, the Board of Supervisors adopted Ordinance 116-06, directing that the City employ a CEQA Initial Study Checklist based on the form included in Appendix G of the state CEQA Guidelines. Accordingly, the Planning Department has recently adopted a new Initial Study Checklist, consistent with Appendix G but also incorporating additional questions specific to the urban environment of San Francisco. This new checklist includes some new topic areas that are generally not relevant within San Francisco and, upon consideration, haven been determined not to involve any potential environmental impacts resulting from the proposed project. These topics include agriculture, airports (with regard to noise and hazards), septic systems, flood hazard zones, and mineral resources. The new Initial Study checklist includes a section on recreation, a topic which is addressed under Land Use, Plans, and Policies (Chapter III.A) in the DEIR.

CHAPTER II

PROJECT DESCRIPTION

A. SITE LOCATION

The San Francisco Marina is located between Fort Mason and the Presidio on San Francisco's northern waterfront (see Figure 1, Project Location). The San Francisco Marina, hereafter referred to as "the marina," consists of two harbors: the West Harbor and the East Harbor. Portions of the marina's West Harbor and the Marina Green are remnant landscape elements from the 1915 Panama-Pacific International Exposition. Following closure of the Exposition, the areas south of the marina were subdivided for residential development, becoming today's Marina District neighborhood.

The project site is in an area predominately characterized by recreational and open space uses along the waterfront and residential and neighborhood commercial uses inland. The marina is situated between Fort Mason and the Presidio, both of which are part of the Golden Gate National Recreation Area (GGNRA). The GGNRA is one of the largest and most visited national parks in an urban setting, comprising 74,000 acres of open space and recreational uses along 28 miles of coastline in San Francisco, Marin, and San Mateo Counties. The marina is within the legislative boundaries of the GGNRA.

To the west of the marina is the Presidio, a former active military base that became a part of the GGNRA in 1994. Since 1998, the Presidio has been jointly managed by the National Park Service and The Presidio Trust. The Presidio contains a total land area of 1,480 acres that includes 500 historic buildings, a collection of coastal defense fortifications, a national cemetery, a saltwater marsh and ecological reserve, forests, beaches, native plant habitats, coastal bluffs, and hiking and biking trails.

To the east of the marina is Fort Mason Center. In use by the military for over 200 years, Fort Mason was converted to civilian use and became part of the GGNRA in 1977. Since then, Fort Mason Center has become one of San Francisco's cultural centers, containing 40 nonprofit organizations as well as museums, theaters, and restaurants. Farther east, Upper Fort Mason contains the administrative headquarters of the GGNRA as well as public access areas.

Other recreational and educational uses in the vicinity of the project site include the Marina Green, a public park located outside of the project site, south of the seawall between the West and East Harbors; Aquatic Park, consisting of a municipal fishing pier and the National Maritime Museum to the east of Fort Mason; and the Palace of Fine Arts lagoon and park (which also includes the Exploratorium, a hands-on science museum for children) southwest of the marina.

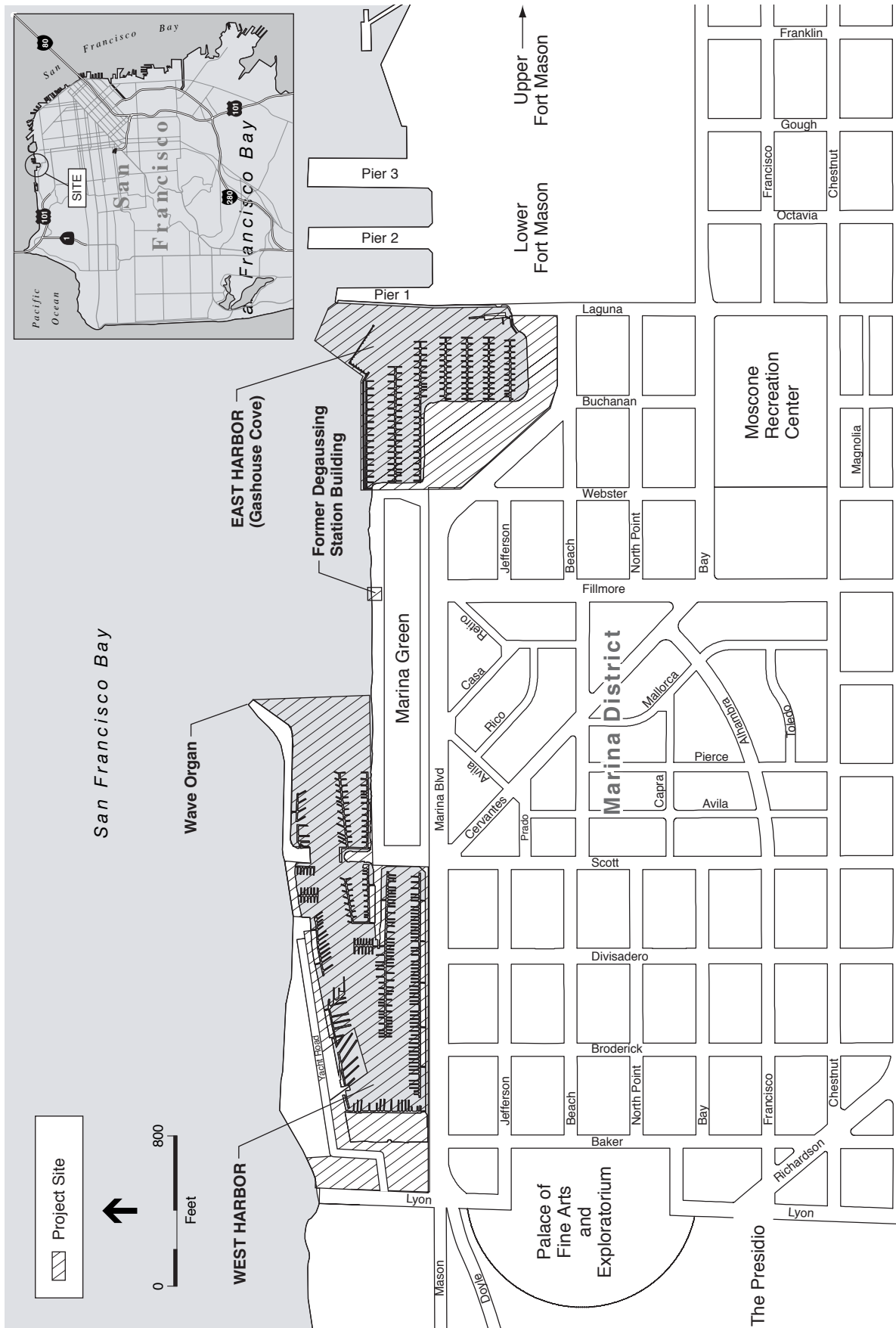


Figure 1
Project Location

SOURCE: Environmental Science Associates

Residential uses are located to the south, southeast, and southwest of the marina. Single-family homes line the south side of Marina Boulevard, across the street from the project site and the Marina Green, as well as streets farther south.

The Marina Safeway anchors a small commercial district immediately south of the East Harbor. Small-scale neighborhood commercial uses along the Marina District's main shopping thoroughfare, Chestnut Street, are located approximately four blocks south of the project site.

The project site (within Assessor's Block 900, Lot 003) is in a P (Public) District and an OS (Open Space) Height and Bulk District. The Presidio (west of the project site) and Fort Mason (east of the project site) are also within P and OS Districts.

EXISTING PROJECT SITE CONDITIONS

The San Francisco Marina is in the Marina District on San Francisco's northern waterfront, on property under the jurisdiction of the San Francisco Recreation and Park Commission. The marina consists of two harbors: the West Harbor and the East Harbor, also known as Gashouse Cove. Figure 2 shows the Existing Site Plan.

The West Harbor is generally bound by Marina Boulevard and the western end of the Marina Green to the south, Yacht Road and the outer jetty to the north, the harbor entrance to San Francisco Bay to the east, and Yacht Road to the west. The West Harbor covers about 1,100,000 square feet of water area in two basins: an inner basin and an outer basin (about 39 acres in total for both harbors). The total land area of both harbors, including sidewalks, gangways, and parking, covers about 830,000 square feet (about 19 acres). The West Harbor marina facilities include the Harbor Office building (which also houses a public restroom and tenant showers), a public restroom, a refreshment concession stand, four parking lots, and slips to accommodate 326 boats. The Recreation and Park Department also uses a San Francisco Public Utilities Commission (SFPUC) pump station as a maintenance building in the West Harbor to support marina operations. Adjacent to the West Harbor but outside of the project area are the St. Francis and Golden Gate Yacht Clubs, a miniature lighthouse (no longer in use), and the wave organ at the tip of the north jetty.

The East Harbor encompasses about 600,000 square feet of water area and is bound by Beach Street to the south, San Francisco Bay to the north, Lower Fort Mason to the east, and Marina Boulevard and Webster Street to the west. The East Harbor marina facilities consist of slips for 342 boats, yacht sales and fuel concession, a nonoperational boat hoist, a public restroom, two vehicle parking lots, and one parking lot for trailered boats (currently unused). Boat slips in both harbors consist of wooden floating docks and gangways anchored by creosote-treated wood pilings.¹ Slips are supplied with water and electrical service, and docks are lighted at night.

¹ Some of the older, creosote-treated pilings were replaced after the Loma Prieta earthquake in 1989.

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San Francisco Bay

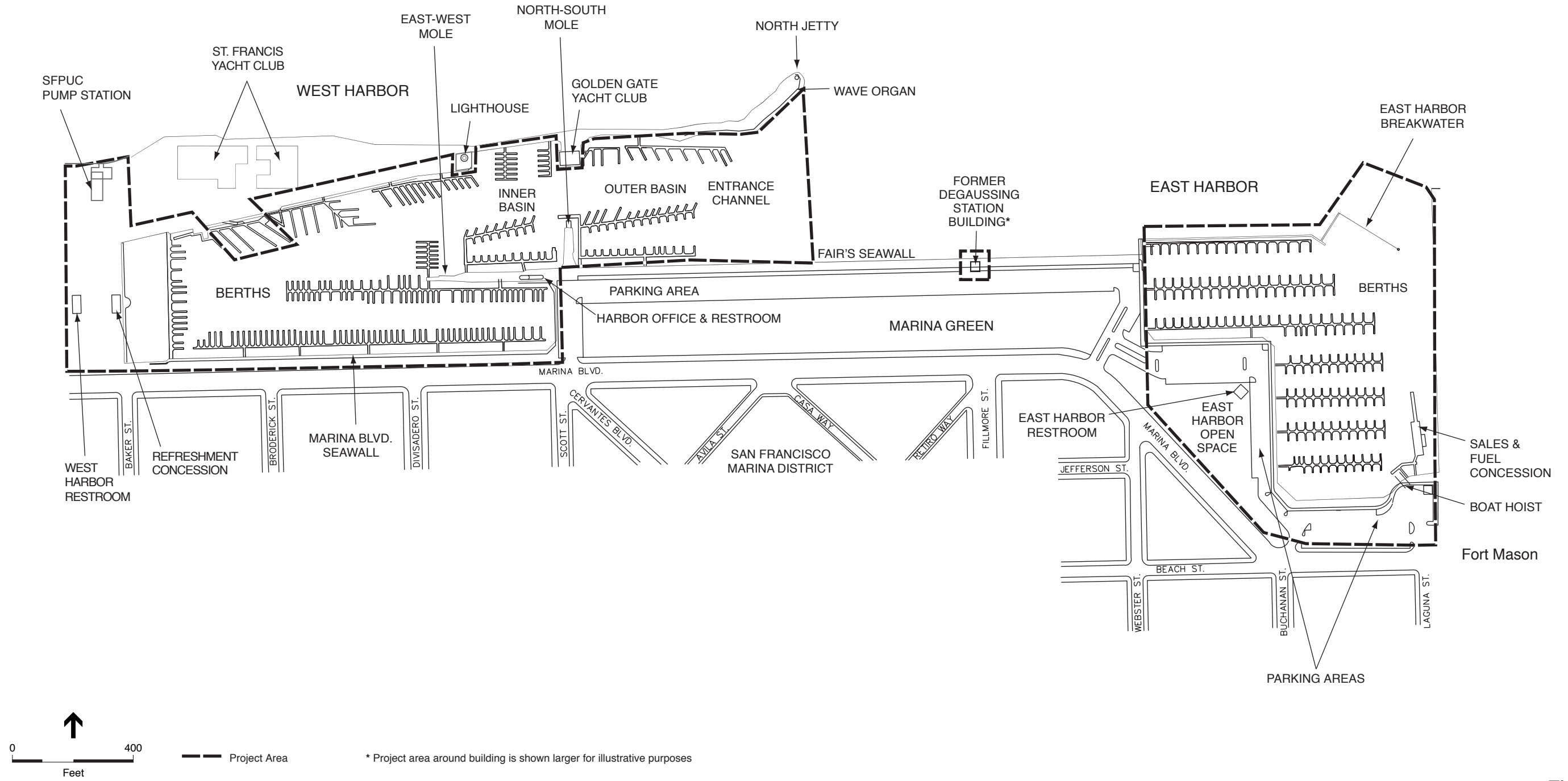


Figure 2
Existing Site Plan

SOURCE: Department of Public Works, Bureau of Engineering, City and County of San Francisco, ESA

On the project site between the East and West Harbors is the former U.S. Navy Degaussing Station,² located on the water's edge roughly north from the end of Fillmore Street. The Degaussing Station is separated from the Marina Green by a parking lot. The Marina Green is also located between the two harbors, but is just outside of the project boundaries. This approximately seven-acre public park is bound by Marina Boulevard to the south, San Francisco Bay to the north, Scott Street to the west, and Webster Street to the east.

The marina is used year-round as a recreational boating center. Berths at the marina are in high demand, with an active waiting list of several hundred boat-owners. Both harbors are in a degraded condition due to deferred maintenance, damage from wave action and storms, and routine use. Some damaged marina facilities have been removed over the years (due to the cost of repairs), and many of the existing docks and associated utilities have become obsolete or unsafe for marina tenants, guests, and other users (Moffatt & Nichol, 2002).

Elevated levels of polynuclear aromatic hydrocarbons (PAHs) have been detected in soil and groundwater sampled in East Harbor sediments, as well as at properties to the southeast of the East Harbor (Arthur D. Little, 2000). These contaminated soils originated from a former manufactured gas plant that existed southeast of the project site on land now occupied primarily by the Marina Safeway (hence the name "Gashouse Cove").

B. PROJECT CHARACTERISTICS

The San Francisco Marina Renovation Project (the project) consists of renovations to selected marina facilities in both the East and West Harbors of the San Francisco Marina. The project includes waterside improvements over the entire 39-acre waterside portion of the marina and on 12 of the total 19 landside acres, as well as renovation of the 700-square-foot former U.S. Navy Degaussing Station for use as a new Harbor Office. The project does not include any improvements to the St. Francis or Golden Gate Yacht Clubs, the lighthouse, the Marina Green,³ or the SFPUC pump station, and Recreation and Park Department use of the SFPUC facility would end.

WATERSIDE IMPROVEMENTS

Waterside marina renovations would include installation of three new breakwater segments (one in the East Harbor and two in the West Harbor); removal of two breakwater structures (moles) in the West Harbor near the foot of Scott Street; reconstruction of portions of the degraded riprap slopes around the interior shorelines of both harbors; replacement and reconfiguration of the floating docks and slips in both harbors (including replacement of all wood piles, regardless of

² The Degaussing Station was used by the U.S. Navy as a base for demagnetizing ships during the World War II era. Ships going into or coming out of the Bay were demagnetized to prevent them from attracting magnetic mines.

³ While there is no legal definition of the Marina Green boundaries, this area is commonly associated with the rectangular greensward bound by Marina Boulevard to the south, San Francisco Bay on the north, Scott Street on the west, and Webster Street on the east. Parkland areas east of Webster Street are associated with the East Harbor of the marina and are therefore not considered part of the Marina Green.

their age, with concrete piles to accommodate the new slip design); addition of two hand boat launches (one in the East Harbor and one in the West Harbor); and maintenance dredging of about 181,000 cubic yards of material (approximately 87,000 cubic yards from the West Harbor and approximately 94,000 cubic yards from the East Harbor).

Proposed waterside improvements are shown in Figure 3 and described in greater detail in Table 1. The numbers shown in Figure 3 that correspond to the major project components are also identified in Table 1, where appropriate. Other waterside project components include replacement of gangways and security gates; installation of one oily water and sewage pumpout facility in the West Harbor (and refurbishment of the two existing sewage pumpouts, one in the West Harbor and one in the East Harbor); and upgrades of electrical and water services to the new floating docks and improved lighting on the docks in both harbors. At project completion, the total number of boat berths (slips) would decrease from 668 to 628, although the average slip length would increase from about 32 to 38.5 feet. Not included in the total number of slips are four 110-foot berths in the West Harbor leased to the St. Francis Yacht Club, which would remain unchanged under the project.

While the total number of boat slips would decrease by 40, the area of water currently occupied by floating docks would increase by about 34,000 square feet. New docks and slips would be located in portions of the outer basin of the West Harbor where none currently exist,⁴ and about 40 percent of the slips in the West Harbor would be realigned from a north-south orientation to an east-west orientation to face the prevailing winds for safer maneuvering. All new berths in the East Harbor would maintain their existing a north-south orientation.

The dredging plan for the marina is currently in the design stages; however, dredging activities, including sediment disposal, would be performed in accordance with Regional Water Quality Control Board permit requirements. It is expected that activities in the East Harbor would entail dredging about 94,000 cubic yards of sediment to depths of -7 feet mean low lower water (MLLW) in the harbor and -11 feet MLLW in the channel, including a 2-foot overdredge⁵ to a depth of -9 to -13 feet MLLW to allow for placement of an engineered cap of clean fill over the sediments remaining in place, and installation of the cap to prevent the disturbance of potentially contaminated sediments in this area. The exact amount of dredge and cap materials, and the specific methods by which they would be removed or installed, would be determined in compliance with regulatory directives, and therefore could change somewhat from those identified here. The proposed breakwaters are also in the design stages. As currently envisioned, two rock-filled or sheetpile breakwaters would be constructed in the outer basin of the West Harbor, and a floating, pile-supported breakwater would be constructed in the East Harbor. These breakwaters would protect marina structures from locally generated wind-waves from the north and northeast directions.

⁴ Many of the new berths would technically replace berths that historically existed in the outer basin of the West Harbor but were removed over time due to deterioration or unsafe conditions (about 21 berths). For purposes of this EIR, however, they would be considered new.

⁵ Overdredging in this context means to dredge deeper than the operational depth to allow for placement of the cap.

San Francisco Bay

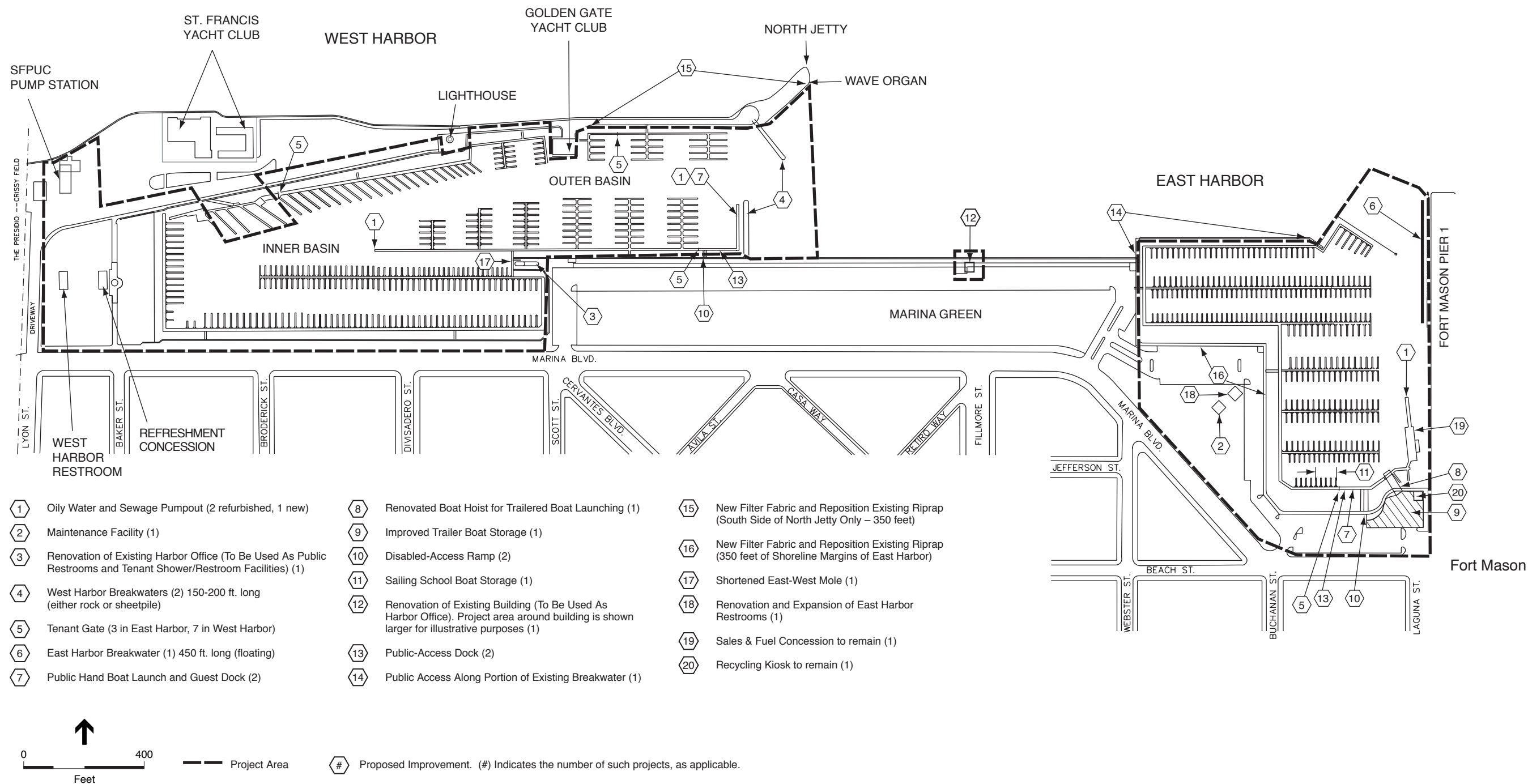


Figure 3
Proposed Site Plan

SOURCE: Department of Public Works, Bureau of Engineering, City and County of San Francisco, ESA

**TABLE 1
PROPOSED WATERSIDE IMPROVEMENTS**

Element	Existing Conditions	Proposed Project Improvements
<i>West Harbor</i>		
Outer Basin Breakwater	North jetty, about 2,200 feet long	Add 150-foot-long breakwater perpendicular to existing north jetty (either sheetpile or rock). [4] Add 200-foot-long breakwater perpendicular to Marina Green seawall at south side of basin (either sheetpile or rock). For rock breakwaters only, this would result in placement of 10,000 to 15,000 square feet of new fill below mean high tide [MHT]). Sheetpile would require substantially less. [4]
Inner Basin Breakwater	Breakwaters (moles) at foot of Scott Street. North-south breakwater: 150 linear feet. East-west breakwater: 450 linear feet	Remove entire north-south breakwater, shorten east-west breakwater by about 375 linear feet. (This would result in the removal of 12,000 cubic yards/16,000 square feet of existing fill below MHT.) [17]
Revetments	2,200-foot-long north jetty (protected with riprap along shoreline)	Add filter fabric and reposition existing riprap along 350 linear feet of shoreline on the south side only of the north jetty. [15]
Boat Services	One sewage pumpout	Renovate existing pumpout and add one new, resulting in 2 oily water and 2 sewage pumpout facilities, same area. [1]
Public Access	Guest dock	Construct an enlarged replacement guest dock and add a hand boat launch. [7]
Dredging	Dredging is done periodically as part of marina maintenance (the West Harbor was last dredged in 2001). ^a	Maintenance dredge 87,000 cubic yards under existing maintenance dredging permit issued by the U.S. Army Corps of Engineers.
<i>East Harbor</i>		
Breakwater	600-foot-long concrete and 250-foot-long sheetpile breakwater	Add 450-foot-long by 15- to 20-foot-wide floating breakwater (wave attenuation structure) adjacent to Fort Mason Pier 1. (This would result in the placement of 200 square feet of new fill below MHT.) [6]
Revetments	About 1,550 linear feet of shoreline riprap	Add new filter fabric and reposition existing riprap along 350 linear feet of shoreline. [16]
Boat Services	Boat hoist	Renovate boat hoist. [8]
	One sewage pumpout	Refurbish sewage pumpout facility (to include capacity for oily wastewater). [1]
	Boat sales and fuel concession	Sales and fuel facility to remain. [19]
	Used oil and oil-filter recycling kiosk	Recycling kiosk to remain. [20]
Public Access	None	Install public-access dock with hand boat launch and guest dock. [7] Construct public-access path along 600 linear feet of existing breakwater. [14]
Dredging	The East Harbor was last dredged in 1989.	New dredging of approximately 94,000 cubic yards; additional sediment sampling and testing would be required before a permit for dredging and disposal could be obtained. Place engineered cap of clean sandy fill (about 51,500 cubic yards). Exact amounts of dredge and cap materials could change in compliance with regulatory directives.

The bracketed numbers following the proposed project components in Table 1 correspond to the numbers shown on Figure 3.

**TABLE 1 (Continued)
PROPOSED WATERSIDE IMPROVEMENTS**

Element	Existing Conditions	Proposed Project Improvements
Both Harbors		
Floating Docks	Floating docks supported by 705 creosote-treated wood pilings Wooden floating docks on timber pilings providing berths for 668 boats	Remove 705 creosote-treated wood piles and replace with 750 concrete piles (12- to 18-inch-diameter, 40- to 60-foot-long concrete piles to be driven within the footprint of marina docks, to extend about 5 feet above MHT); reduce total number of boat berths to 628.
	Average berth length of 32 feet	Increase average length of berths to 38.5 feet.
	Majority of West Harbor slips oriented north-south	Change orientation of about 40% of the West Harbor slips to east-west.
	Approximately 120,200 square feet of area covered by floating docks	Estimated net increase in area covered after removal and reconfiguration of existing docks: 34,000 square feet.
	21,280 linear feet of floating docks	Estimated net increase in floating docks: 3,335 linear feet.
Slip Size (Number of Slips / Percent of Total)	20 feet: 39 / 6% 25 feet: 216 / 32% 30 feet: 174 / 26% 35 feet: 90 / 13% 40 feet: 75 / 11% 45 feet: 25 / 4% 50 feet: 17 / 3% 60 feet: 26 / 4% 70 feet: 0 / 0% 80 feet: 2 / 0.2% 90 feet: 4 / 0.6% Total: 668 / 100%	20 feet: 0 / 0% 25 feet: 16 / 2% 30 feet: 148 / 24% 35 feet: 190 / 30% 40 feet: 141 / 23% 45 feet: 53 / 8% 50 feet: 41 / 7% 60 feet: 26 / 4% 70 feet: 4 / 0.6% 80 feet: 4 / 0.6% 90 feet: 5 / 0.8% Total: 628 / 100%
Boat Type	63% sailboats / 37% power boats	63% sailboats / 37% power boats (anticipated)
Utilities	Electrical service; water service; fire protection (fire extinguishers, not plumbed water service); and lighting	Upgrade electrical service to minimum capacity of 30 amps per berth; eliminate exposed cables and wires. Upgrade water system and fire protection stations on floating docks to meet applicable codes; replace water lines and add new pipes and valves for fire control access. Replace and standardize telephone service conduits. Install new lights on docks as docks are replaced (lights would be near ground level to light walking path).
Access	23 gates; 24 wooden gangways and 3 aluminum gangways	Replace gates with new units and reduce the total number of gates from 23 to 10 (3 in East Harbor, 7 in West Harbor). [5] Replace wooden gangways with aluminum units and reduce the total number of gangways from 24 to 10 (3 in East Harbor and 7 in West Harbor). Add 1 Americans with Disabilities Act (ADA)-compliant access ramp in West Harbor and 1 ADA-compliant access ramp in East Harbor. [10]

The bracketed numbers following the proposed project components in Table 1 correspond to the numbers shown on Figure 3.

^a The San Francisco Planning Department determined that the West Harbor dredging would not have a significant effect on the environment and issued a Negative Declaration for that project on May 18, 1999. This document is available for review by appointment as part of Case File No. 1998.834E at 1660 Mission Street, Suite 500, San Francisco, CA, 94618.

**TABLE 2
PROPOSED LANDSIDE IMPROVEMENTS**

Element	Existing Conditions	Proposed Project Improvement
<i>West Harbor</i>		
Harbor Office	1,100-square-foot building used for office, public restrooms, and tenant showers. Office hours of operation: 8 a.m. to 5 p.m. daily, staff on duty until midnight patrolling the grounds.	Convert 400 square feet of office space into tenant restrooms and showers (add 2 sinks and 2 toilets); no square footage would be added. Hours of operation: 6 a.m. to 10 p.m. daily. [3]
Public Restroom	1,000-square-foot public restroom	Upgrade for ADA compliance. [3]
SFPUC Pump Station	Currently used by the Recreation and Park Department as maintenance facility to store materials used in marina maintenance (about 1,500 square feet in use)	No physical changes; Recreation and Park Department would no longer use this facility.
Parking	Approximately 719 spaces (495 general spaces, 206 boater-only spaces, 18 disabled-access spaces)	Install suitable barriers on boater-only spaces to control access during the restricted parking period (from 10:00 p.m. to 6:00 a.m., daily); no change in number of spaces.
Landscaping	Grass with a few trees and shrubs	Replace distressed or dead trees and shrubs and reseed grass as necessary (not DBW funded).
<i>East Harbor</i>		
Restroom	1,970-square-foot public restroom	Expand by 600 square feet to add tenant showers and restrooms (add 6 toilets, 6 sinks, and 6 shower stalls); limited excavation required (less than 10 cubic yards). [18] Upgrade public restroom for ADA compliance.
Area Adjacent to Restroom	Open space, grass	Construct new, one-story, 1,000-square-foot, ADA-compliant maintenance building (about 32 feet square by about 15 feet high). Limited shallow excavation required (about 100 cubic yards). [2]
Parking	Approximately 441 total parking spaces (340 general spaces, 95 boater-only spaces, 6 disabled-access spaces)	Install suitable barriers on boater-only spaces to control access during the restricted parking period (from 10:00 p.m. to 6:00 a.m., daily); no change in number of spaces.
Landscaping	Landscaped strip about 10 feet wide along edge of harbor and near restroom	Repair damaged or distressed trees, shrubs, and grass along landscaped edge and plant new grass and shrubs near new maintenance building and renovated restroom (not DBW funded).
<i>Both Harbors</i>		
Former Degaussing Station Building	Vacant 700-square-foot building	Renovate for use as Harbor Office. No additional square footage would be added; existing porch would be enclosed; a new egress would be added; other renovations would be to the interior of the building (reconstruction of interior walls; new plumbing, wiring, paint, light fixtures, and flooring). Upgrade for ADA compliance. Office hours: 8 a.m. to 5 p.m. daily, staff on duty until midnight patrolling grounds. [12]

The bracketed numbers following the proposed project components in Table 1 correspond to the numbers shown on Figure 3.

SOURCE: Department of Public Works, City and County of San Francisco, 2004

LANDSIDE IMPROVEMENTS

The landside project improvements would include renovation of the public restrooms in the Harbor Office and conversion of the existing office space (400 square feet) into tenant showers and restrooms; renovation of the former U.S. Navy Degaussing Station (now vacant) for use as the new Harbor Office; renovation of the restrooms in the existing 1,970-square-foot East Harbor public restroom building, with the addition of about 600 square feet for tenant showers and restrooms; construction of a new 1,000-square-foot, one-story maintenance building near the East Harbor restrooms (used to store material for maintenance of marina facilities); improvements to onshore electrical and telephone utilities; and access modifications to the parking lots. With the construction of the new maintenance building for material storage, the Recreation and Park Department would no longer use the existing 1,500-square-foot SFPUC pump station in the West Harbor, which would remain unoccupied. Landside improvements are shown in Figure 3 and described in more detail in Table 2. The numbers shown in Figure 3 that correspond to the major project components are also identified in Table 2, where appropriate.

Additional landside improvements would include new and improved informational and instructional signs in the marina in addition to parking lot improvements. No change in the number of parking spaces would occur at either the East or West Harbor parking lots, although access control barriers would be installed to allow boater-only access to designated parking spaces between the hours of 10:00 p.m. and 6:00 a.m. (when the marina is closed). These parking spaces are currently designated as boater-only parking between the hours of 10:00 p.m. and 6:00 a.m., although no access controls are in place. The East Harbor parking area would be improved by renovating an existing boat hoist for boat launching and utilizing the former boat trailer storage area immediately southeast of the boat hoist. The roughly 13,600-square-foot boat trailer storage area is currently unused because the boat hoist is nonoperational, but has the capacity to hold about 24 trailered boats at one time. Once the boat hoist has been renovated, it is expected that trailered boat storage would return on a daily basis, and that some owners of the small craft currently berthed at the marina would convert to put-in/take-out use.

Public-access improvements would be made to public restrooms as well as along a portion of the East Harbor breakwater. Americans with Disabilities Act (ADA)-compliant access ramps would be added in the East and West Harbors.

PROJECT SCHEDULE

Construction of the proposed project would take up to about 36 months (about 20 months in the West Harbor and 16 months in the East Harbor). Waterside work would be staged to limit displacement of marina tenants. The staging would involve replacing portions of the floats and pilings and performing associated dredging in sections of the marina, with marina tenants temporarily relocated during each stage. A tenant relocation plan would be developed in conjunction with project design work to minimize the number and duration of temporary relocations. It is expected that temporary locations would be provided for most tenants who

choose to stay at the marina during project construction. First, the slips adjacent to the north jetty (at the entrance channel to the West Harbor) that have been removed over the years would be rebuilt. These rebuilt slips would then be used as temporary accommodation for boats displaced as construction proceeds from one area of a harbor to another. After design and permitting, project construction would be phased to begin in the West Harbor (where construction is expected to last for 20 months) and then move to the East Harbor (where construction is expected to last for 16 months). Landside work would occur over the same period, concurrent with waterside work. Construction is expected to begin in 2007.

In April 2003, the San Francisco Board of Supervisors approved an application to the California Department of Boating and Waterways (DBW) for a loan in the amount of \$38,000,000 to cover the cost of the project.⁶ In August 2003, the San Francisco Recreation and Park Commission approved berth rental rate increases for both the East and West Harbors, to be phased in between 2003 and 2008. In November 2004, the DBW approved a loan of \$16,500,000 to finance proposed renovations to the West Harbor alone. The costs associated with the proposed renovation of the East Harbor would be approximately \$19,500,000. These additional project costs for renovations to the East Harbor would be funded primarily through additional loans from the DBW, although several other funding mechanisms may be used. Additional project funding would be subject to the approval of the Recreation and Park Commission and the Board of Supervisors.

C. PROJECT SPONSOR'S OBJECTIVES

The project sponsor is the San Francisco Recreation and Park Department and the San Francisco Recreation and Park Commission. The project sponsor's objectives for the proposed project are to:

1. Provide a safer, more modern marina with a longer useful life.⁷
2. Protect marina structures from locally generated wind-waves from the north and northeast directions.
3. Provide a slip-size distribution that more closely matches market demand.
4. Expand and modernize the Harbor Office and relocate the Harbor Office to a site near both the West and East Harbors.
5. Better serve marina tenants as well as the general public by providing new and improved facilities, including new docks and walkways, and new publicly accessible walks at the East Harbor; new and upgraded toilet facilities and showers (including new disabled access); new and repaired boat launch facilities at both harbors and a refurbished guest dock at the West Harbor; upgraded facilities for boat sewage pumpout; and enhanced landscaping.

⁶ Board of Supervisors Resolution 149-03.

⁷ The *San Francisco Marina Renovation Feasibility Study* (Moffatt & Nichol, 2002) describes current conditions and identifies the need for numerous physical improvements.

The project sponsor's rationale for the inclusion, or in some cases the exclusion, of specific project components is described below:

- **Proposed Breakwaters.** New breakwaters are proposed as part of the project to protect marina structures and boats from the damaging effects of north- and northeast-driven waves. The DBW strongly recommends the installation of breakwaters in any area subject to damaging wave activity. The placement of breakwaters and their general design would be consistent with this recommendation, because the breakwaters would reduce the damaging effects of wave action at the marina and would protect the investment that the City and DBW would be making as part of the project.
- **Proposed Changes to Slip Size and Construction Type.** A market feasibility study of the marina determined that there is a strong market demand for a different mix of slip sizes than is currently available at the marina, one that would accommodate the recent shift toward the ownership of larger boats, both sail and power, for both existing and future tenants and visitors (Moffatt & Nichol, 2002). Over half of the marina's existing slips are less than or equal to 30 feet in length. Approximately 85 percent of the 498 boaters on the marina waiting list desire slips 30 feet or longer.⁸

Creosote pilings, which anchor the existing slips and docks, would be replaced with concrete pilings due to the environmental problems associated with creosote in a marine environment. Concrete is less toxic to the marine environment, and the removal of creosote pilings would improve overall water quality in the immediate area.

- **Proposed Changes to the Degaussing Station, Maintenance Facility, and Restrooms.** Due to current office space constraints and inefficiencies (lack of ADA accessibility) in the existing Harbor Office, and the inability to enlarge the building due to site constraints, the Degaussing Station would be renovated to be the new Harbor Office, and to make the Harbor Office accessible to people with disabilities and those who need assistance or information from the harbormaster. Moving the Harbor Office to the Degaussing Station would also free up space to convert the existing Harbor Office to an ADA-compliant public restroom. The relocated Harbor Office in the renovated Degaussing Station would be roughly equidistant from the East and West Harbors. Currently, the Harbor Office is located in the West Harbor, over half a mile from the East Harbor, making it difficult to oversee boating activities in this part of the marina.

The Recreation and Park Department would construct a new maintenance facility to replace the current maintenance facility, which is in a structure owned by the SFPUC, which has expressed the desire to close this facility. The new maintenance building would be located at the East Harbor to be more centrally located, and for its adjacency with other structures in the area (the East Harbor restrooms).

The East Harbor restrooms would be expanded and/or renovated for ADA compliance. They are intended for the use of boaters only, similar to the West Harbor restrooms and showers. By providing bathroom and shower facilities, the marina would be able to accommodate guest boaters in the East Harbor (guest boaters are currently accommodated in the West Harbor only). Guest and permanent boaters would then be more inclined to use landside showers and toilets, and less inclined to use their on-board toilets and showers, which would reduce accidental spills and/or overflows from the holding tanks of vessels.

⁸ The *San Francisco Marina Renovation Feasibility Study* (Moffatt & Nichol, 2002) describes current conditions and identifies the need for numerous physical improvements.

These measures would improve water quality in the East Harbor. Public restrooms would be open during park hours (6 a.m. to 10 p.m.), as they are currently. Boaters-only restrooms could be accessed with a key at any time, as they are currently.

- **Seawall Improvements Not Proposed as Part of the Project.** Upgrades to the seawalls are not proposed as part of the project due to the prohibitive cost associated with structural repairs. The project would be funded by a loan from DBW, which limits the scope of repairs to marina-use improvements. In addition, two detailed geotechnical reports regarding the seawall's structural stability (Harding Lawson Associates et al., 1991; Treadwell and Rollo, 1997) considered it to be economically infeasible to address the stability of the entire marina area, and recommended that the City make repairs to the seawall, utilities, and sidewalk/jogging path behind them after a major earthquake.

D. APPROVALS REQUIRED

This EIR will undergo a public comment period as noted on the cover, including a public hearing before the Planning Commission on the Draft EIR. Following the public comment period, responses to written and oral comments will be prepared and published in a Draft Response to Comments document. The Draft EIR will be revised as appropriate and, with the Draft Response to Comments document, presented as the Final EIR to the Planning Commission for certification as to its accuracy, objectivity, and completeness. No approvals or permits may be issued before the Final EIR is certified. Certification of the Final EIR may be appealed to the Board of Supervisors.

APPROVALS

The proposed project is subject to review by agencies with appropriate jurisdiction, as well as by various City agencies and commissions. In order for the project to proceed, the following approvals would be required:

- Major Permit from the San Francisco Bay Conservation and Development Commission for all renovation activities.
- Section 401 water quality certification from the San Francisco Bay Regional Water Quality Control Board for dredging in the East Harbor.
- Sections 404 and 10 permits from the U.S. Army Corps of Engineers (ACOE) for dredging in the East Harbor (an ACOE permit is already in place for dredging in the West Harbor).
- Compliance with Federal Endangered Species Act (in accordance with consultation requirements among the ACOE, the U.S. Fish and Wildlife Service, and National Oceanic and Atmospheric Administration Fisheries).
- San Francisco Recreation and Park Commission to approve the final loan agreement.
- San Francisco Recreation and Park Commission to approve construction contract awards.
- San Francisco Planning Commission to determine project consistency with the San Francisco General Plan and Planning Code.

- San Francisco Department of Building Inspection to approve building permit applications for new or altered buildings.
- San Francisco Arts Commission to approve design and alterations of structures on City property.

CHAPTER III

ENVIRONMENTAL SETTING AND IMPACTS

This section presents a discussion of existing land uses at the project site and vicinity and describes how the proposed project could change the physical arrangement of land uses on the project site. The Initial Study prepared for this project (see Appendix A) determined that the project would not disrupt or divide a community, nor substantially impact the character of the surrounding Marina District neighborhood. Regardless, an evaluation of potential land use effects has been included in this EIR for informational purposes.

A. LAND USE, PLANS, AND POLICIES

EXISTING LAND USES

PROJECT SITE

The San Francisco Marina is located in the Marina District on San Francisco's northern waterfront, on property under the jurisdiction of the San Francisco Recreation and Park Commission. The marina consists of two harbors: the East Harbor, also known as Gashouse Cove, and the West Harbor. The East Harbor encompasses about 600,000 square feet of water area. The West Harbor covers about 1,100,000 square feet of water area in two basins: an inner basin and an outer basin (about 39 acres in total for both harbors). The total land area of both harbors, including sidewalks, gangways, and parking, covers about 830,000 square feet (about 19 acres). Figure 1 on p. II-2 shows the Project Location, and Figure 2 on p. II-4 shows the Existing Site Plan.

The marina facilities in the West Harbor include the Harbor Office (which also houses a public restroom and tenant showers), a public restroom, a refreshment concession stand, four parking lots, and slips to accommodate a total of 326 boats in both the inner and outer harbors. The Recreation and Park Department also uses an existing San Francisco Public Utilities Commission (SFPUC) pump station as a maintenance building in the West Harbor to support marina operations. The St. Francis and Golden Gate Yacht Clubs and a stone lighthouse are located outside of, but immediately adjacent to, the project site. Marina facilities in the East Harbor consist of slips for 342 boats, yachts sales and fuel concession, a nonoperational boat hoist, a public restroom, and two parking lots. Boat slips in both harbors consist of wooden floating docks and gangways supported by creosote-treated wood pilings. Slips are supplied with water, telephone, and electric service, and docks are lighted at night.

The project site (within Assessor's Block 900, Lot 003) is in a P (Public) District and an OS (Open Space) Height and Bulk District.

PROJECT AREA

The project site is in an area predominately characterized by recreational and open space uses along the waterfront and residential and neighborhood commercial uses inland.

The marina is situated between Fort Mason and the Presidio, both of which are part of the Golden Gate National Recreation Area (GGNRA). The GGNRA is one of the largest and most visited national parks in an urban setting, comprising 74,000 acres of open space and recreational uses along 28 miles of coastline in San Francisco, Marin, and San Mateo Counties.

At the east end of the West Harbor (north) jetty is the wave organ, a wave-activated acoustical structure built by the Exploratorium museum in the 1980s. The wave organ includes 25 organ pipes located at various elevations within the site. Sound is created by the impact of waves against the pipe ends and the subsequent movement of the water in and out of the pipes.

To the west of the marina is the Presidio, a former active military base, which became part of the GGNRA in 1994 and is administered by the GGNRA. Since 1998, the Presidio has been jointly managed by the National Park Service and The Presidio Trust. The Presidio contains a total land area of 1,480 acres that includes 500 historic buildings, a collection of coastal defense fortifications, a national cemetery, a saltwater marsh and ecological reserve, forests, beaches, native plant habitats, coastal bluffs, and hiking and biking trails. The Presidio is in a P (Public) District and an OS (Open Space) Height and Bulk District.

To the east of the marina is Fort Mason Center. In use by the military for over 200 years, Fort Mason was converted to civilian use and became part of the GGNRA in 1977. Since then, Fort Mason Center has become one of San Francisco's cultural centers, containing 40 nonprofit organizations as well as museums, theaters, and restaurants. Farther east, Upper Fort Mason contains the administrative headquarters of the GGNRA as well as public access areas. Fort Mason is also in a P (Public) District and an OS (Open Space) Height and Bulk District. Zoning to the southeast of the project site includes NC-2 and NC-S Districts (Small-Scale Neighborhood Commercial and Neighborhood Commercial Shopping Center, respectively) along Chestnut and Buchanan Streets. Height and Bulk Districts in the project vicinity to the south of the marina are 40-X.

Other recreational and educational uses in the vicinity of the project site include Marina Green park adjacent to and south of the marina; Aquatic Park to the east of Fort Mason; and the Palace of Fine Arts lagoon and park (which also includes the Exploratorium, a hands-on science museum for children) southwest of the marina.

Residential uses are located to the south, southeast, and southwest of the marina. Single-family homes line the south side of Marina Boulevard across the street from the project site. These

homes are mostly two to three stories and are typically set back from the street. Many of these homes date from the 1920s; however, some contemporary infill development has occurred among them. Spanish eclectic and Mediterranean styles define the residential character of the area; common building materials include wood, stucco, and terra cotta. Larger, multifamily apartment houses, generally four stories tall, are located to the south and southwest of the site, predominately along Alhambra, Beach, Fillmore, and Scott Streets.

Small-scale neighborhood commercial uses line the Marina District's main shopping thoroughfare, Chestnut Street, located approximately four blocks south of the project site. Chestnut Street consists of a diverse mix of shops, restaurants, and services in a neighborhood setting. A supermarket (Marina Safeway) is located immediately south of the East Harbor between Buchanan and Laguna Streets. Small commercial establishments are located south of North Point Street on the ground floor of mixed-use residential buildings.

PLANS AND POLICIES

SAN FRANCISCO GENERAL PLAN

The San Francisco General Plan contains 10 elements (Commerce and Industry, Recreation and Open Space, Residence, Community Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts) that provide goals, policies, and objectives for the physical development of the city. In addition, the General Plan includes area plans that outline goals and objectives for specific geographic planning areas. The following General Plan policies and objectives are among those applicable to the proposed project:

Open Space and Recreation Element

- Policy 2.2: Preserve existing public open space.
- Policy 2.3: Preserve sunlight in public open spaces.
- Objective 3: Provide continuous public open space along the shoreline unless public access clearly conflicts with maritime uses or other uses requiring a waterfront location.
- Policy 3.1: Assure that new development adjacent to the shoreline capitalizes on its unique waterfront location, considers shoreline land use provisions, improves visual and physical access to the water, and conforms with urban design policies.

Urban Design Element

- Objective 1: Emphasis of the characteristic pattern which gives to the city and its neighborhoods an image, a sense of purpose, and a means of orientation.
- Policy 1.1: Recognize and protect major views in the city, with particular attention to those of open space and water.

- Policy 1.7: Recognize the natural boundaries of districts, and promote connections between districts.
- Objective 2: Conservation of resources which provide a sense of nature, continuity with the past, and freedom from overcrowding.
- Policy 2.4: Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.
- Policy 2.6: Respect the character of older development nearby in the design of new buildings.
- Objective 3: Moderation of major new development to complement the city pattern, the resources to be conserved, and the neighborhood environment.
- Policy 3.2: Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance.
- Policy 3.4: Promote building forms that will respect and improve the integrity of open spaces and other public areas.
- Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.
- Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.
- Objective 4: Improvement of the neighborhood environment to increase personal safety, comfort, pride and opportunity.
- Policy 4.8: Provide convenient access to a variety of recreation opportunities.
- Policy 4.11: Make use of street space and other unused public areas for recreation.
- Policy 4.13: Improve pedestrian areas by providing human scale and interest.

Environmental Protection Element

- Objective 3: Maintain and improve the quality of the Bay, ocean, and shoreline areas.
- Policy 3.2 Promote the use and development of shoreline areas consistent with the General Plan and the best interest of San Franciscans.

Community Safety Element

- Policy 2: Initiate orderly abatement of hazards from existing buildings and structures.

The proposed project would construct a public-access path along 500 feet of existing breakwater as well as undertake additional access and circulation improvements. As such, the proposed project would respond affirmatively to the above Open Space and Recreation Element objectives and policies. The proposed project would also respond affirmatively to the above Urban Design objectives and policies, which seek to protect the city's aesthetic values and sense of place and to create a positive neighborhood environment. Proposed maintenance dredging and capping of East

Harbor sediments would improve water quality of the Bay, responding affirmatively to the above objective and policy of the Environmental Protection Element. Finally, the proposed project would be consistent with Policy 2 of the Community Safety Element, because it would follow the requirements of Chapter 34, Section 3407 of the San Francisco Building Code regarding the abatement of asbestos and lead-based paint in the former Degaussing Station (see Initial Study in Appendix A).

A conflict between a proposed project and a General Plan policy does not, in itself, indicate a significant effect on the environment within the context of CEQA. Any physical environmental impacts that could result from such conflicts are analyzed in this EIR. In addition to considering inconsistencies that affect environmental issues, the Planning Commission considers other potential inconsistencies with the General Plan, independently of the environmental review process, as part of the decision to approve or disapprove a proposed project. Any potential conflict not identified in this environmental document would be considered in that context and would not alter the physical environmental effects of the proposed project that are analyzed in this EIR.

SAN FRANCISCO PLANNING CODE

The City and County of San Francisco Planning Code, which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the Planning Code or an exception is granted pursuant to provisions of the Planning Code. The proposed project would alter and/or renovate existing marina facilities, construct new breakwaters, and construct one small new building, the specific impacts of which are discussed below under the relevant topic heading.

The project site (within Assessor's Block 900, Lot 003) is in a P (Public) District and an OS (Open Space) Height and Bulk District. A public district is land owned by a governmental agency that is in some sort of public use, including open space. Principal permitted uses in P zoning districts include structures and uses of the City and County of San Francisco as well as other governmental agencies, including accessory nonpublic uses, when in conformity with the General Plan and the provisions of other applicable laws, ordinances, and regulations (Planning Code Section 234.1[b]). The Presidio (west of the project site) and Fort Mason (east of the project site) are also zoned P (Public). Properties to the south of the project site are zoned RH-1, RH-2, and RH-3 (Residential House District, One-, Two-, and Three-Family, respectively), and RM-2 and RM-3 (Residential Mixed Districts, Moderate and Medium Density, respectively); zoning to the southeast of the project site includes NC-2 and NC-S Districts (Small-Scale Neighborhood Commercial and Neighborhood Commercial Shopping Center, respectively) along Chestnut and Buchanan Streets. Height and Bulk Districts to the south of the marina are 40-X.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the Planning Code to establish eight Priority Policies. These policies are: (1) preservation and enhancement of neighborhood-serving retail

uses; (2) protection of neighborhood character; (3) preservation and enhancement of affordable housing; (4) discouragement of commuter automobiles; (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness; (7) landmark and historic building preservation; and (8) protection of open space. The Priority Policies, which provide general policies and objectives to guide certain land use decisions, contain some policies that relate to physical environmental issues. The proposed project would not obviously or substantially conflict with any such policy. Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. In evaluating General Plan consistency of the project and reviewing the building permit application for the proposed project, the Planning Commission and/or Planning Department would make the necessary findings of consistency with the Priority Policies.

SUSTAINABILITY PLAN FOR SAN FRANCISCO

In 1993, the San Francisco Board of Supervisors established the Commission on San Francisco's Environment, charged with, among other things, drafting and implementing a plan for San Francisco's long-term environmental sustainability. The notion of sustainability is based on the United Nations definition that "a sustainable society meets the needs of the present without sacrificing the ability of future generations and non-human forms of life to meet their own needs." The *Sustainability Plan for the City of San Francisco* was a result of community collaboration with the intent of establishing sustainable development as a fundamental goal of municipal public policy (Department of the Environment, 1997).

The Sustainability Plan is divided into 15 topic areas, 10 that address specific environmental issues (air quality; biodiversity; energy, climate change and ozone depletion; food and agriculture; hazardous materials; human health; parks, open spaces, and streetscapes; solid waste; transportation; and water and wastewater), and five that are broader in scope and cover many issues (economy and economic development, environmental justice, municipal expenditures, public information and education, and risk management). Additionally, the Sustainability Plan contains indicators designed to create a base of objective information on local conditions and to illustrate trends toward or away from sustainability. Although the Sustainability Plan became official City policy in July 1997, the Board of Supervisors has not committed the City to perform all of the actions addressed in the plan. The Sustainability Plan serves as a blueprint, with many of its individual proposals requiring further development and public comment. The proposed project would respond affirmatively to many of the environmental issues contained in the Sustainability Plan.

SAN FRANCISCO BAY PLAN

The project site is identified in the *San Francisco Bay Plan* (Bay Plan). The Bay Plan, adopted in 1969 by the San Francisco Bay Conservation and Development Commission (BCDC) and since amended, specifies goals, objectives, and policies for San Francisco Bay and shoreline, and is administered by BCDC. The Bay Plan identifies policies for recreational use of the Bay, including marinas. While the Bay Plan does not specifically identify policies for the San Francisco Marina, policies applicable to the Presidio and Fort Mason should be considered due to the proximity of these areas to the proposed project. The Bay Plan identifies the Presidio and Fort Mason as “priority use areas.” Specific to the northern waterfront, priority use areas are guided by the three following land use principals: (1) maintain compatible use of buildings; (2) provide continuous shoreline access; and (3) develop and manage areas within National Park Service jurisdiction for open space and water-oriented recreation. The proposed project appears to be generally consistent with these Bay Plan policies, which would be considered as part of the BCDC permit process for the proposed project.

BCDC is also chartered, pursuant to the McAteer-Petris Act, to regulate filling, dredging, and changes of use in San Francisco Bay, and to regulate new development within 100 feet of the shoreline to ensure that maximum feasible public access to and along the Bay is provided. Section 66605 of the McAteer-Petris Act states, in part, that fill in San Francisco Bay should only be authorized when: (1) the public benefits from the fill clearly exceed the public detriment from the loss of water area; (2) no upland alternative location is available for the project purpose; (3) the fill is the minimum amount necessary to achieve the purpose of the fill; and (4) the fill will minimize harmful effects to the Bay. Finally, BCDC also requires that the fill should be constructed in accordance with sound safety standards.

The three proposed breakwaters, the cap of clean fill in the East Harbor, and the increased square footage of slips and docks throughout the marina would be defined as “fill” by BCDC and for purposes of this project; thus, these elements of the project would require BCDC approval as fill under the McAteer-Petris Act. It appears that the proposed fill would be generally consistent with the above-stated requirements of the act.

In addition to regulating fill, BCDC is also charged with ensuring that the limited amount of shoreline property suitable for regional high-priority water-oriented uses (ports, water-related industry, water-oriented recreation, airports, and wildlife areas) is reserved for these purposes. The project would allow for continued and improved water-oriented recreation uses at the marina. Finally, the Bay Plan requires new waterfront projects to provide maximum feasible public access to the Bay. The proposed project would allow for continued public access to the Bay and would provide public access along the existing East Harbor breakwater where none currently exists. As a result, it appears that the project would be consistent with this requirement.

SAN FRANCISCO BOARD OF SUPERVISORS RESOLUTIONS

The Board of Supervisors previously adopted two resolutions concerning the marina. Resolution 149-03, adopted in April 2003, endorsed the renovation of the marina and authorized the Recreation and Park Commission's loan application to the California Department of Boating and Waterways to finance the proposed renovations.

Resolution 450-94, adopted in May 1994, urged then-Mayor Jordan to oppose the construction of additional breakwaters in the marina's outer West Harbor and to immediately begin dredging of the harbor. The resolution states that breakwaters extending out into open waters would "effectively destroy the scenic beauty enjoyed by recreationalists." The resolution also called for "...the immediate dredging of the Marina Yacht Harbor so that the fireboats that proved so vital during the 1989 Loma Prieta earthquake will be able to properly function during emergencies."

The discussion of the two resolutions is included in this EIR for information purposes. The proposed project appears consistent with Resolution 149-03, as it would renovate the marina, and the California Department of Boating and Waterways has approved the Recreation and Park Commission's loan application.

The proposed project appears to be consistent with one aspect of Resolution 450-94, which urges the mayor to call for immediate dredging of the harbor. The proposed project appears to be inconsistent with the other aspect of Resolution of 450-94, which urges the mayor to oppose construction of breakwaters in the harbor. Unlike a city ordinance, however, a Board of Supervisors' resolution is not a legally binding land use policy. As an "urging" resolution, the action under consideration was not within the jurisdiction of the Board of Supervisors, but rather within the decision-making authority of the Recreation and Park Commission. The resolution was also an expression of the view of a majority of the Board of Supervisors at the time the resolution was approved in 1994. As a result, neither resolution pertains to the proposed project.

Nonetheless, where new breakwaters would result in potentially significant adverse environmental effects, such effects are analyzed in this EIR. Dredging is discussed in Section III.E, Hydrology and Water Quality, and Section III.F, Hazardous Materials and Waste.

LAND USE CHANGES

With the project, there would be no change to the existing variety of recreational and open space uses on the project site. Furthermore, the project would not disrupt or divide the physical arrangement of the Marina Green, nor adversely affect ongoing recreational uses at either the St. Francis or Golden Gate Yacht Clubs.

While the proposed project would make changes to site development, it would not disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any businesses, residences, or other uses. Although existing boat tenants could be

temporarily relocated during construction, they would not be permanently displaced by the project, as they would have the opportunity to return once renovations are complete.

Implementation of the proposed project could attract some new boaters and recreation users to the project site with the addition of hand boat launches, renovation of the boat hoist, and improvements to public access and restrooms. Maritime and recreation uses, however, have been ongoing at the site and vicinity for many years, and the proposed project would therefore be consistent with the site's existing uses. Implementation of the project would result in fewer, although (on average) longer, berths in the marina, which could attract some larger boats to the marina; however, several boats currently moored at the marina are in berths that are too small, and some marina tenants are expected to move their boats into the larger berths (Gross, 2004). Even the addition of somewhat larger boats would be a continuation of a compatible use in the project area.¹

- Reoriented slips or the addition of slips and docks within the outer basin of the West Harbor where none currently exist would also be a continuation of compatible uses in the project area and therefore would not have a significant land use effect. In addition, the loss of the mole at the foot of Scott Street, which is a popular destination for public viewing, seating, strolling, etc., would not have a significant land use impact, as these uses would continue to be available in other locations at the marina, including the entire length of the Fair's Seawall as well along the East Harbor breakwaters.

- The currently vacant Degaussing Station would be renovated for use as the new Harbor Office. The project would shift both office workers and visitors from the existing Harbor Office in the West Harbor to the Degaussing Station, located on the water's edge between the East and West Harbors. However, overall usage levels of this facility and hours of operation under project conditions would represent a continuation of an existing use and are not expected to increase compared to current usage levels and hours of operation (8am to 4pm, seven days a week). As a result, no significant land use impacts associated with renovation of the Degaussing Station are expected.

The proposed maintenance building in the East Harbor area would be constructed on about two acres of land dedicated primarily to open space (except for the East Harbor restroom and parking lots). While the maintenance building would occupy about 1,000 square feet of the project area currently unoccupied by structures, such use would not be inconsistent with the recreation and park uses on the site, as it would be an ancillary structure devoted to maintenance of the recreation facilities. Furthermore, a similar building already exists on the site (i.e., the SFPUC building). The SFPUC building would no longer serve as the marina's maintenance facility, as such use would be shifted to the new maintenance building. The SFPUC building would remain vacant. The project would also expand the 1,970-square-foot restroom facilities in the East Harbor by approximately 600 square feet to add tenant showers and restrooms. This action would represent a minor expansion and an enhancement of a current use and would bring the publicly

¹ As illustrated in Table 1 in the Project Description, p. II-8, the number of the largest boat berths (70 feet to 90 feet) would increase from 6 to 13 (+7 berths). The most noticeable change in berth size, however, would occur in the mid-range 30- to 40-foot category (339 existing berths, increasing to 479 berths under project conditions, [+140 berths]).

- accessible facilities up to Americans with Disabilities Act (ADA) compliance. The construction of the maintenance building and the expansion of the restrooms in the East Harbor open space area would reduce the usable lawn area by about 0.02 acres, or about 2 percent of the two-acre open space area, a relatively small amount which would not preclude the use or enjoyment of the area for recreational purposes. As a result, no significant land use impacts associated with new construction or expansion in the East Harbor open space area are expected.

During the project's construction phases, some marina users would be temporarily relocated; some boaters might permanently relocate to other marinas, and others might choose to take temporary berthing that would be available to most users within the marina during the phased construction of project improvements. The construction would be phased to provide for initial reconstruction of slips that have been removed due to past deterioration. These new slips would be used to accommodate boats as they are temporarily displaced for dredging, pile driving, and dock rebuilding in a small section of the marina. Once one section of rebuilding is complete, the displaced boats would be moved to their new berths and the next group of boats would be moved for the subsequent phase of construction, and so on. A tenant relocation plan would be distributed, and the opportunity to discuss the plan with marina management would be given to marina tenants prior to construction.

The proposed project would also have temporary impacts on landside site uses during construction, since the restrooms and Harbor Office would be closed for short periods during renovations. Temporary, portable toilet cabinets would be moved onto the site during restroom renovations. The Degaussing Station would be renovated prior to the Harbor Office so that office equipment and personnel could be moved to their new locations prior to renovation of the Harbor Office.

The proposed project would not substantially affect any of the existing offsite, adjacent uses and activities, such as the open space in the Marina Green or the wave organ located at the end of the West Harbor's outer jetty. Access to the outer jetty and the wave organ might be temporarily restricted during riprap installation, but public access to this popular waterfront spot would not be permanently restricted. Surrounding uses and activities would therefore generally continue and would interrelate with each other as they do presently, without disruption due to the proposed project and with no change in the character of the area. Therefore, the project would not result in significant impacts related to land use.

NEIGHBORHOOD CHARACTER AND COMPATIBILITY

The proposed project would not have a substantial adverse impact on the existing character of the project site or on the neighborhood character of the site's vicinity. As discussed above, the proposed project would undertake renovations and improvements to the marina and would not substantially alter its use as a boating and recreation center. The project would improve the character of the area by undertaking public-access upgrades, such as ADA improvements, and a new pathway along the breakwater in the East Harbor. Moreover, the project would upgrade both

the East and West Harbor restrooms, thereby enhancing these public conveniences. These improvements would not detract from the character of the site or vicinity.

Although the project would replace and reorient some of the existing berths to accommodate slightly larger craft (on average), this change would not represent an adverse impact to the character of the site or its surroundings, as new uses would be consistent with existing maritime/recreational uses. Because the presence of potentially larger and/or reoriented craft (as well as the project's proposed breakwaters) could alter the visual environment, these changes are analyzed in Section III.B, Visual and Aesthetic Resources. The project's proposed new maintenance building and restroom expansion/renovations would also be consistent with the prevailing uses and would not adversely affect the site's character. These uses occur presently on the site (e.g., restrooms and maintenance building) or would occur within existing buildings already on the site (e.g., the Harbor Office and the Degaussing Station). Thus, surrounding uses and activities would generally continue and would interrelate with each other as they do presently, without disruption due to the proposed project and with no adverse change in the character of the area. Therefore, the project would not result in significant impacts related to neighborhood character. For similar reasons, the proposed project would not disrupt or divide the physical arrangement of an established community.

CUMULATIVE EFFECTS

The cumulative impact analysis evaluates the potential impacts of the proposed project in combination with other reasonably foreseeable projects. Seven substantial projects are currently in various stages of planning or environmental review in the vicinity of the marina. They are: (1) the Fort Mason Center Long Term Lease; (2) the Doyle Drive Replacement Project; (3) the Muni E-Line Extension to Fort Mason; (4) the Presidio Trust Management Plan; (5) the Crissy Field Marsh Expansion; (6) the Tennessee Hollow Restoration Project; and (7) the Ferry Access Study. Detailed descriptions of these potential projects are provided on pp. 70–72 of the Initial Study (see Appendix A).

These projects generally represent the continuation and expansion of existing uses (e.g., Fort Mason Center Long Term Lease and the Presidio Trust Implementation Plan), replacement of existing uses (e.g., Doyle Drive Replacement), extension of public transit service (e.g., potential Muni E-Line Extension and Ferry Access Study), and the continued enhancement of the natural environment (e.g., Crissy Field Marsh Expansion and the Tennessee Hollow Restoration Project). The specific designs of the future projects are not yet finalized (with the exception of the proposed Fort Mason Center Long Term Lease); therefore, a detailed assessment of the land use impacts of these projects within the context of the proposed project is not possible until each project undertakes its own project-level environmental review. However, as the proposed project would have no adverse land use impacts, it can be concluded that the project would not result in cumulatively considerable land use impacts.

B. VISUAL AND AESTHETIC RESOURCES

Based on the conclusions of the Initial Study (see Appendix A), the proposed project could have a demonstrable negative aesthetic effect and could degrade or obstruct scenic views or vistas observed from public areas. These issues are discussed in this section. The Initial Study concluded that the proposed project would have a less-than-significant impact with regard to light and glare, and as such this topic is not discussed in this section.

SETTING

VIEWS

View corridors are described by physical elements, such as buildings that guide lines of sight and control view directions available to pedestrians and motorists. View corridors include the total field of vision visible from a specific vantage point. Public view corridors are areas in which views are available from publicly accessible viewpoints, such as from city streets and other public spaces. Five photographs are presented in this section to supplement the descriptions of publicly accessible views. The locations where photographs were taken are shown on the Viewpoint Locations (Figure 4); the photographs, and corresponding visual simulations, are presented as Figures 5 through 10.

The project site is visible from a number of publicly accessible viewpoints, including the Marina Green (a public park located outside of the project site, south of the seawall between the West and East Harbors); sidewalks along Marina Boulevard; Fort Mason Center; Upper Fort Mason (just south of and upslope from Fort Mason Center); and the open water to the north of the marina.

Long-range views (greater than four miles) from the project site include: San Francisco Bay and the towns of Tiburon and Belvedere to the north, Angel Island to the northeast, and the Golden Gate Bridge and Marin Headlands to the northwest and west. Mid-range views (between one and four miles) from the project site include the dome of the Palace of Fine Arts and the Bay shoreline to the west; Fort Mason, Russian Hill, and the tops of downtown high-rises to the east; and Alcatraz Island to the north. Short-range views (less than one mile) include views of and across the project site, specifically the St. Francis Yacht Club, the Golden Gate Yacht Club and the Lighthouse to the north; the Marina Green and multi-level, single- and multi-family homes along Marina Boulevard to the south; and Fort Mason Center to the west.

The project site is also visible looking north from private viewpoints in the residential areas along Marina Boulevard. From nearby locations, the most prominent visual attributes of the project site are the boats and masts of boats berthed in the marina. The masts appear as a forest of tall, thin posts at a height of up to approximately 40 feet above the water. The upper decks of some of the larger power boats in the marina are also visible. Boats and masts are also visible from viewpoints along Marina Boulevard and in views from nearby north-south streets (e.g., Broderick, Divisadero, Scott, Cervantes, Fillmore, and Webster Streets). Other facilities, some of which are outside of the project boundaries, contribute the project area's visual setting and are

also visible from nearby public and private viewpoints, including the St. Francis Yacht Club, Golden Gate Yacht Club, lighthouse, concession stand, maintenance building/pump station, restroom buildings, and Degaussing Station.

VISUAL CHARACTER

The San Francisco Marina, located along the city's northern waterfront, is characterized by open and expansive views of the horizon, sky, Marin County across San Francisco Bay, and dense urban development in surrounding neighborhoods. The project area may be visually divided into landside and waterside attributes in the West and East Harbor areas, separated by the Marina Green (not included in the project site), and bordered by residential areas in the Marina neighborhood to the south, cultural uses in the Fort Mason Center to the east, and predominately natural open space areas within Crissy Field, and a mix of uses in the Presidio to the west.

The West Harbor comprises the following elements:¹ the Harbor Office, the Degaussing Station, the Marina Boulevard Seawall, West Harbor jetty, West Harbor lighthouse, West Harbor restroom, and the concession stand. Landside, the Harbor Office is a single-story, Spanish Eclectic structure, located at the end of Scott Street, adjacent to the West Harbor. The Harbor Office is a concrete building with cobblestone cladding, a hipped roof clad in barrel tile, and decoratively carved wood rafter tails. The former U.S. Navy Degaussing Station, a now-vacant building originally constructed in 1951 and reconstructed in 1984, is located partially on top of the Fair's Seawall between the two harbors; it is adjacent to the Marina Green and overlooks the San Francisco Bay. This utilitarian, wood-frame building is one story in height and has a rectangular plan, horizontal siding, and an asphalt shingle-hipped roof. The Fair's Seawall is about 2,000 feet long and 8 feet tall at high tide and retains the western end of the Marina Green, protecting it from the Bay's wave action. The wall is constructed of concrete and clad in basalt cobblestone that slopes and steps down toward the Bay.

The West Harbor jetty protects the West Harbor from San Francisco Bay. It was constructed in two parts; the western portion extends about 800 feet from the eastern end of the St. Francis Yacht Club, and tapers down to a point about 75 feet wide. The surface of the jetty is paved with asphalt, and its walls facing both the Bay and the inner marina are clad in cobblestone. Extending further east from the first jetty is the secondary north jetty. This jetty is about 1,500 feet long and 25 feet wide, with a dirt road about 10 feet wide running along its top. It is of earthen construction with brick and stone rubble on the sides that is slanted about 45 degrees.

A breakwater, or "mole," extends into the West Harbor, partially dividing the harbor into the inner basin (the area closest to Marina Boulevard), and the outer basin (the area closest to the Golden Gate Yacht Club and the West Harbor jetty). The inner basin breakwater is about 400 feet long, 25 feet wide on the eastern end, narrowing to a point about 10 feet wide on the western end. It has a flat, asphalt surface and is currently used for vehicle parking and loading. Wood plank gangways lead down to the inner and outer basin docks from this breakwater. The walls of the

¹ For more information related to architectural resources, refer to Section III.C, Historic Resources, of this EIR.

breakwater rise vertically about 8 feet above the water line and are clad in stone similar to that found throughout the West Harbor of the marina.

Adjacent to, but outside of, the project area is the Marina Green, a seven-acre public park originally constructed in 1915 as a landscape element of the Panama-Pacific International Exposition. The Marina Green consists of a flat field of mowed grass about 1,700 feet long and 150 feet wide. The green is encircled by wide, paved sidewalks on all sides and parking areas to the north, south, and west and provides open space and visual relief between the West and East Harbors. Marina Boulevard runs parallel to the green immediately to the south, separated from the Marina Green by a wide concrete sidewalk. Public views of the Bay and the distant North Bay horizon are available across Marina Green from Marina Boulevard.

Also adjacent to, but outside of, the project area is the wave organ. The wave organ is an art installation located at the end of the jetty in the West Harbor, constructed by the Exploratorium in 1986. It has a stone seating area facing south and made up of recycled granite, concrete, and brick architectural elements, as well as concrete tubing.

The East Harbor is characterized on the land side by utilitarian structures and landscaping related to the function of the marina. Park-like landscaping appears at the western edge of the East Harbor where it abuts the Marina Green. The area's utilitarian quality is defined by driveways, a parking lot for automobiles and boat trailers, a boat hoist, corrugated-metal recycling sheds, breakwater, and boat slips that are adjacent to Fort Mason Center. A driveway through the East Harbor parking lot provides primary access to and from Fort Mason Center. The view to and from the Fort Mason Center west entrance encompasses this maritime-industrial character.

Waterside, the East Harbor's maritime setting is characterized by boats moored in the marina behind a breakwater. The East Harbor's north breakwater is constructed of concrete and steel and supports a concrete deck. The irregularly shaped structure is roughly 900 feet long and 6 feet wide and rises about 15 feet above the high-tide mark. Steel pipe railings encircle the pedestrian walkway atop the breakwater. Steel gangplanks lead down from the breakwater to boat docks below. A steel door constructed of chain-link fencing is located near the East Harbor's landside entrance.

In both the West and East Harbors, the primary natural feature is water. This artificially calm water zone exemplifies nature transformed by human activity and is the area's most important visual feature. Other elements that contribute to the visual setting include the piers, docks, boat slips, moored boats, gates, seawalls, access roads, surface parking lots, sidewalks, grassy and planted areas, the SFPUC maintenance building located between the east edge of Marina Green and Lyon Street, and additional buildings outside of the project boundaries, such as the St. Francis Yacht Club and the Golden Gate Yacht Club.

IMPACTS

SIGNIFICANCE CRITERIA

In accordance with the CEQA Guidelines, the San Francisco Planning Department generally considers that implementation of a proposed project would have a significant visual and aesthetic resources impact if it would:

- Substantially degrade or obstruct publicly accessible scenic views; or
- Substantially degrade the existing visual character or quality of the area, or result in a substantial, demonstrable negative aesthetic effect.

The significance determination is based on the extent of change related to project visibility from key public vantage points, the degree of visual contrast and compatibility in scale and character between proposed project elements and the existing surroundings, and the sensitivity of the affected view. Representative views are identified on Figure 4, Viewpoint Locations.

Representative views are depicted by a photograph. Each photograph is followed by a corresponding computer-modeled photosimulation of the general appearance of the elements proposed as part of the project. The photosimulations are based on conceptual project plans and are not meant to be realistic representations of the project's architectural elements; rather, they are meant to illustrate potential effects on views and urban design. Moreover, in the case of the project's proposed reoriented slips, the photosimulations should be understood as a "worst-case scenario," in that all slips are shown at full occupancy, occupied by the largest craft possible given slip lengths/widths and at high tide. In addition, some of the views are panoramic shots showing a 140-degree view, which is equivalent to the maximum cone of human vision or the extent of the visual field from a stationary viewpoint.² The figures include both existing and simulated views and are discussed in the impact analysis. For information pertaining to the proposed project's potential light and glare effects, please refer to the Initial Study (Appendix A).

VIEWS

Figure 5A (from Viewpoint 1) illustrates an existing northwesterly panoramic view from the public pathway along the East Harbor. The view from Viewpoint 1 is characterized by water and vegetation along the water's edge, which is bordered by a public pathway that leads to the East Harbor parking area to the right in the photo. The East Harbor's angular metal boat hoist is visible along the waterfront. Parked cars and boats are visible in the East Harbor's flat, paved surface parking area, in addition to recycling containers and the Fort Mason Center gatehouse and wall.

² Some of the panoramic photographs included in this section may exhibit a condition known as *barrel distortion*, a photographic effect that causes images to be spherised or "inflated." Barrel distortion is associated with wide angle lenses, such as those used to create the panoramic photographs in this EIR. This effect typically occurs at the wide end of a zoom lens, resulting in straight lines that appear to bend away from the center of the image, prevalent in Figures 5, 8, 9, and 10.

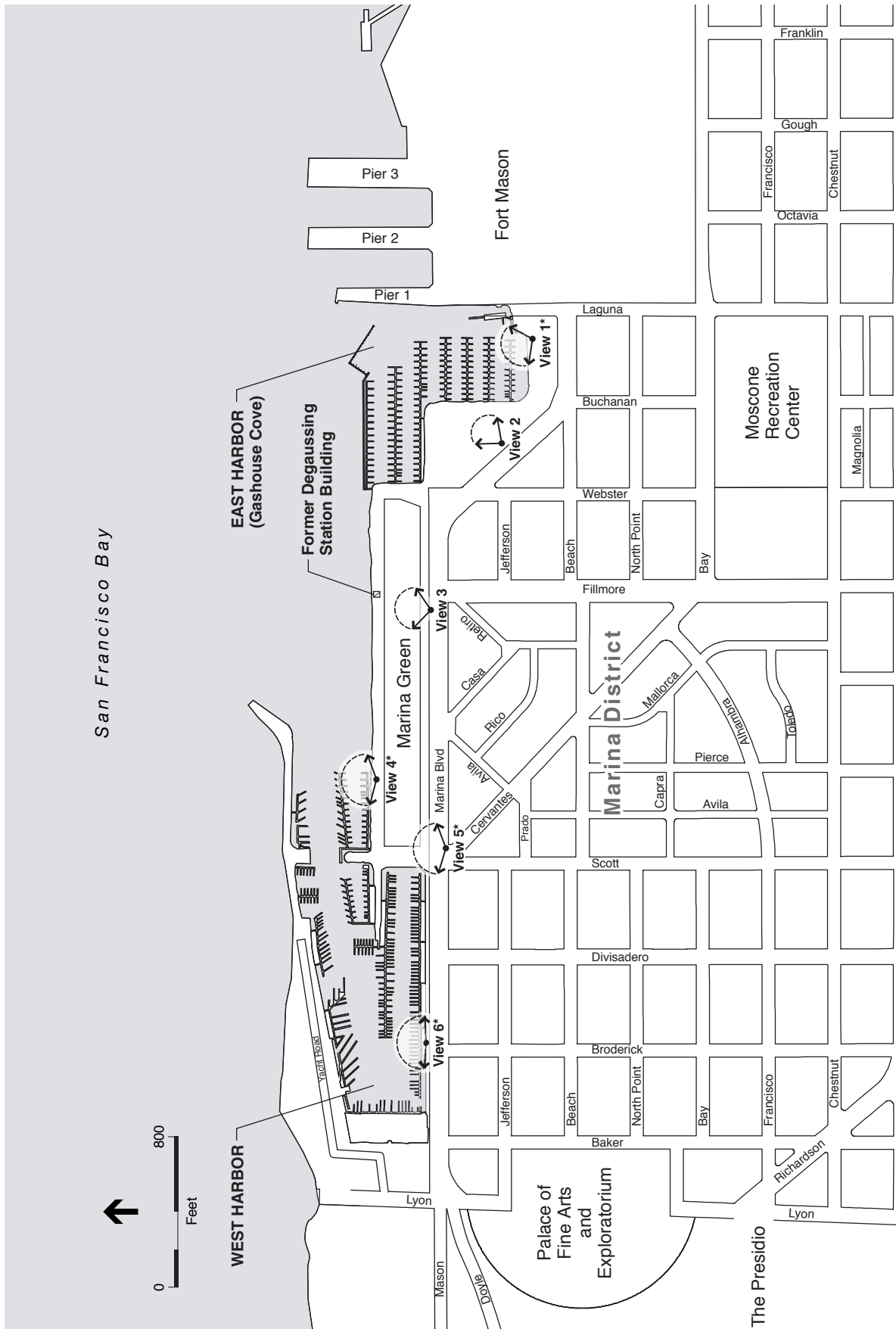


Figure 4
Viewpoint Locations

* Panoramic View

SOURCES: 3D Visions; Environmental Science Associates



A. Existing panoramic view of the East Harbor from the public pathway looking northeast



B. Simulated panoramic view of the East Harbor from the public pathway looking northeast

SOURCE: 3D Visions, 2004

Figure 5
Existing and Proposed Views
from Viewpoint Location 1

A stand of acacia trees terminates mid-ground landside views. Waterside, moored boats are visible in the East Harbor, their masts partially obscuring the horizon in the distance. A fuel concession station is prevalent in front of Building A at Fort Mason. In the background, Fort Mason's Pier 1 extends over the water, obstructing long-range northeasterly views across the Bay. In the distance, long-range views are partially available of the Marin Headlands' hilly shoreline.

Figure 5B (from Viewpoint 1) simulates the possible visual changes under project conditions. As illustrated by the simulation, a new ADA access ramp and dock would be visible in the foreground and would occupy open-water portions of the East Harbor where no structures currently exist. The project would also line the East Harbor with new riprap, not visible in this simulation. Waterside views in the mid-ground would be altered by the replacement slips and docks; this view shows a greater number of slightly larger boats and taller masts visible in the East Harbor compared to existing conditions. The taller masts, the size of which are directly proportionate to the increased size of the boats, would continue to partially obscure long-range views of the Marin Headlands in the distance, similar to existing conditions. The proposed improvements to the East Harbor breakwater would provide over 500 linear feet of public access along the breakwater, creating additional public viewing locations. Views from the proposed access on the East Harbor breakwater would include panoramic views of the San Francisco Bay, Alcatraz Island, Marin Headlands, and Golden Gate Bridge to the north and northwest. Views of the project site and the Marina District and Russian Hill skylines would be available to the south.

The project's landside changes would result in visual changes to the East Harbor parking lot near Fort Mason Center. The boat hoist would be rebuilt in the same size and configuration as the existing hoist, although it is shown painted a darker shade with a matte finish. Up to 24 trailered boats could be stored in the East Harbor parking lot, some of which are shown in Figure 5B. The acacia trees behind the trailered boat storage would continue to terminate mid-ground views from this point. The project's proposed East Harbor floating breakwater would be parallel to Pier 1, its vertical exposure barely visible above the surface of the water. Although rendered in a light shade in the simulation, the actual breakwater would appear much darker, similar to the dark shade of the pilings supporting Pier 1. As shown in the simulation, the breakwater would not significantly obstruct publicly accessible views. As shown in Figure 5B, proposed project changes would not substantially alter views of or from Fort Mason Center, including views as one travels through the entrance gate. Proposed project features would appear generally compatible with the maritime-industrial character of both the East Harbor and Fort Mason Center.

Figure 6A (from Viewpoint 2) presents the existing view from the East Harbor open space looking northeast. Existing foreground views are characterized by the East Harbor's expansive grassy area. Mid-ground views are of a single-story restroom set in front of mature trees. To the east, the masts of moored ships in the East Harbor are visible. Background views of Angel Island are partially obscured by the mature trees and ships' masts in the West Harbor.

Figure 6B simulates the proposed 1,000-square-foot maintenance building that would be located in the East Harbor open space area. The maintenance facility would be visible from sidewalks

along Marina Boulevard, Fort Mason, and nearby private residences and businesses. The new single-story (about 15 feet in height) maintenance building would be located near the existing public restroom to minimize view blockage of the marina and open water beyond when looking north, as the new building would be directly in front of (south from) the existing building. Although not designed yet, and therefore not reflected in Figure 6B, the proposed maintenance building and exterior modifications to the East Harbor restroom would incorporate design elements of existing onsite buildings, including details of fenestration, color, and building materials. (This simulation depicts this building as a cement block structure, without fenestration, to illustrate a “worst-case” scenario.) Changes to the East Harbor restroom, partially visible behind the new maintenance structure, are also not apparent in simulations included in this EIR, but could be visible from adjacent points. As illustrated in Figure 6B, the proposed location of the maintenance building in front of tall trees and adjacent to existing structures would not substantially degrade or obstruct any scenic view now observed from public viewpoints. The view is partially obstructed under existing conditions, and under project conditions the trees and other buildings adjacent to the maintenance building would continue to obstruct views of Tiburon and the Marin Headlands in the distance, though the view blockage would be slightly greater due to the new maintenance building. The existing marina facilities would continue to be visible under the proposed project.

Figure 7A (from Viewpoint 3) provides an existing view of the Degaussing Station from the sidewalk along the southern side of the Marina Green near the intersection of Marina Boulevard and Fillmore Street. Foreground views are defined by the Marina Green’s expansive grass area. Mid-ground views include parking along the northern edge of the Marina Green. The Degaussing Station is visible behind parked cars. Chain-link fencing and signage are also visible around the perimeter of the Degaussing Station. Angel Island is visible in long-range views in the background, as well as the hilly horizon of the Tiburon Peninsula.

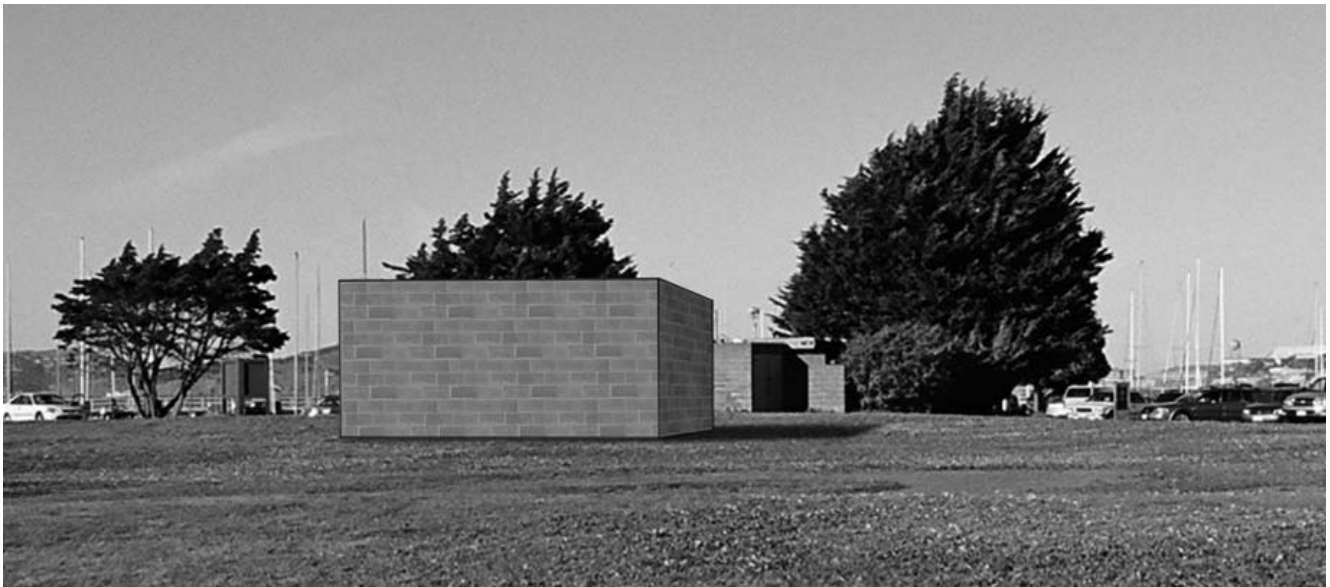
Figure 7B (from Viewpoint 3) illustrates views under project conditions. The proposed project would renovate the vacant Degaussing Station for use as the Harbor Office, without adding square footage to the building. Most of the renovations would occur to the interior of the building and would generally not affect exterior views. The project would remove the signage and chain-link fencing surrounding the structure. Thus, changes to the Harbor Office would not substantially degrade or obstruct publicly accessible views at this location.

Figure 8A (from Viewpoint 4) presents the existing panoramic view from the outer basin of the West Harbor looking north. Foreground views are characterized by the basalt cobblestone edge of the seawall and flat expanses of water in the West Harbor’s outer basin. A chain-link fence is visible in the center of the view, partially submerged in the water. Mid-ground views are of floating docks and moored boats (oriented north-south) to the northwest. Background views include glimpses of the Golden Gate Bridge through the masts of sailboats, the Marin Headlands, Angel Island, and Alcatraz Island, as well as the East Bay Hills rising on the distant horizon. Figure 8B simulates changes to existing views from Viewpoint 4 under project conditions.



A. Existing view of the East Harbor open space looking north

New maintenance building
(expanded restrooms behind)



B. Simulated view of the East Harbor open space looking north

SOURCE: 3D Visions, 2004

Figure 6
Existing and Proposed Views
from Viewpoint Location 2



A. Existing view of the former Degaussing Station from the Marina Green looking north

Rehabilitated
Degaussing Station
(New Harbor Office)



B. Simulated view of the proposed Harbor Office from the Marina Green looking north

SOURCE: 3D Visions, 2004

Figure 7
Existing and Proposed Views
from Viewpoint Location 3



A. Existing panoramic view of the outer basin of the West Harbor from the Fair's Seawall looking north

New floating docks; reoriented slips (foreground and background)



B. Simulated panoramic view of the outer basin of the West Harbor from the Fair's Seawall looking north

SOURCE: 3D Visions, 2004

Figure 8
Existing and Proposed Views
from Viewpoint Location 4

Changes would occur predominately in foreground views. As illustrated in the simulation, the project would reorient the boat slips from north-south to east-west, and new slips would be added in portions of the outer basin where none currently exist. The visibility of the boats would slightly intensify, given that longer boats with taller masts or superstructures could be moored here. However, the overall number of boats moored in the West Harbor of the marina would be generally similar to existing conditions, and the total number present would fluctuate on a daily basis, as is currently the case.

Boats are a component of the existing visual landscape at the marina, and the potential increase in boat size (on average about 6.5 feet in length) would not substantially change the visibility of boats at the project site. For this reason, the addition of longer and/or larger boats at the marina after renovation would not substantially degrade or obstruct any scenic view, nor alter the overall maritime character of the project site or its surroundings. The presence of larger or longer boats in marina slips would continue to allow for long-distance views through boats at the marina to nearby locations, and long-distance views of the marina would appear essentially the same as under existing conditions.

As noted, the proposed project would also alter the orientation of slips in the marina, and boat slips would exhibit a more regular and uniform configuration. The existing marina slips have a somewhat irregular spacing and size distribution pattern. In the West Harbor, slips are predominately configured perpendicular to Marina Boulevard (i.e., north-south). After renovation, about 40 percent of the slips in the West Harbor would be reoriented east-west. This slip orientation would occur in the outer basin and in a small section of the inner basin and would provide views of the broadside of some boats, as opposed to views of the narrower bows or sterns, as shown in Figure 8B. This reconfiguration of slips would not substantially degrade or obstruct any scenic view, nor significantly alter the existing maritime character of the marina.

The proposed waterside improvements would include two new breakwaters in the West Harbor. One of the new breakwaters would be visible in the foreground, as shown from Viewpoint 4, approximately 500 feet east of the existing Harbor Office, and would extend about 200 feet into the harbor. The addition of the breakwater would not result in an adverse visual effect, because a rock-filled type breakwater would be visually consistent with the basalt cobblestone facing of the Fair's Seawall, nor would it obstruct views, because the proposed breakwaters would be at grade with the seawall and jetty (approximately 8 feet above mean high tide). The second breakwater would extend from the outer jetty, and would also be visually consistent with the riprap facing along the outer jetty, and would be minimally visible in the mid-ground. As shown in the simulation, the new breakwaters would not substantially obstruct views of the Bay, Golden Gate Bridge, Angel Island, Alcatraz, or the Marin Headlands, and such panoramic views would continue to be available under project conditions.

Although not shown in the simulations, a metal sheetpile-type breakwater could be chosen instead of the rock-filled type. The type of material would be determined during the project design phase, but would likely consist of materials present at the existing sheetpile breakwater in the East Harbor, such as thin, corrugated-steel sheeting with a concrete cap. Sheet-metal-type breakwaters

might be less visually consistent with the rock-faced seawall and outer jetty than rock-filled breakwaters, but would be no taller or longer than rock-filled breakwaters and would not obstruct views of the Bay, Golden Gate Bridge, or other long-range views. Sheetpile breakwaters could actually be less visually apparent than rock-filled breakwaters, due to their smaller footprint. Regardless of which type of breakwater is ultimately constructed in the West Harbor, no substantial adverse impacts to views or visual quality are expected.

Figure 9A (from Viewpoint 5) provides a panoramic view of the West Harbor and the Marina Green, from the intersection of Marina Boulevard and Cervantes Avenue looking north. The foreground is dominated by pavement. In the mid-ground, the Marina Green and the project site are discernible, with the masts of moored boats in the West Harbor rising above the horizon. In the distance just above street level to the west, the Golden Gate Bridge is visible in glimpses through rising masts. To the north, the Marin Headlands and Angel Island are visible over the flat, open area of the Marina Green, though direct views are interrupted by boat masts in the West Harbor's outer basin.

Figure 9B illustrates project conditions from Viewpoint 5. From this location, the project's renovated Harbor Office and East Harbor restrooms are not visible, though the changes in slip orientation and taller boat masts associated with the proposed project would be visible from this location. As discussed, the existing marina slips have a somewhat irregular spacing and size distribution pattern. In the West Harbor, slips are predominately configured perpendicular to Marina Boulevard (i.e., north-south). After renovation, about 40 percent of the slips in the West Harbor would be reoriented east-west. This slip orientation would occur in the outer basin and in a small section of the inner basin and would provide views of the broadside of some boats, as opposed to views of the narrower bows or sterns, as shown in Figure 8B. Nonetheless, distant views of the Golden Gate Bridge, the Marin Headlands, and Angel Island would continue to be available under project conditions. Boats are currently visible from these viewpoints and are a part of the scenic landscape, and views of boats as part of the area's setting under project conditions would not substantially degrade or obstruct publicly accessible scenic views from Marina Boulevard.

Figure 10A (from Viewpoint 6) illustrates the existing panoramic view of the inner basin of the West Harbor from the Fair's Seawall looking north. This viewpoint emphasizes foreground views of the bows or sterns of boats along floating docks. To the west, a gangway leads to a security gate that regulates entry to the floating docks. In the background, views of moored craft in the outer basin are visible. Mature trees in front of the St. Francis Yacht Club terminate views in the distance. Figure 10B (from Viewpoint 6) simulates changes in existing views under project conditions. At this location, the most prominent visual change would be in the foreground where the project's replacement floating docks would be visible from the waterside of the seawall. Slip length, width, and orientation would be identical to existing conditions in this portion of the inner basin, with the same boat size depicted in the foreground. Gangway access to the dock would be moved further west, as shown at the far left in Figure 10B. Mid-ground views would remain essentially unchanged from existing conditions: the bows and sterns of moored boats would be visible, with a slightly greater concentration of tall masts extending above the water. Distant



A. Existing panoramic view of the West Harbor and Marina Green from the intersection of Marina Boulevard and Cervantes looking north



B. Simulated panoramic view of the West Harbor and Marina Green from the intersection of Marina Boulevard and Cervantes looking north, showing reoriented berths

SOURCE: 3D Visions, 2004

Figure 9
Existing and Proposed Views
from Viewpoint Location 5



A. Existing panoramic view of the inner basin of the West Harbor from the Marina Boulevard Seawall looking north



B. Simulated panoramic view of the inner basin of the West Harbor from the Marina Boulevard Seawall looking north, showing new floating docks

SOURCE: 3D Visions, 2004

Figure 10
Existing and Proposed Views
from Viewpoint Location 6

views toward the outer harbor would continue to include trees in front of the St. Francis Yacht Club.

In conclusion, the project would construct a new landside structure (e.g., the proposed maintenance shed) and modify existing structures on the project site (e.g., the vacant Degaussing Station, restrooms, and boat launch). As illustrated in the simulations, the project's proposed landside changes would not substantially obstruct scenic views. In the case of the proposed maintenance building, the approximately 1,000-square-foot structure would be located in front of the existing restrooms, screened by existing tall trees that partially obscure long-range views to the northeast. Waterside changes entail new floating docks in the East and West Harbors; upgraded floating docks would improve the overall visual quality as well as short-range views of the harbors from public viewing locations along pedestrian pathways. In addition, because the project's proposed breakwaters would be constructed from materials that would be consistent with the marina's character. Moreover, the breakwaters would be about 8 feet above mean high tide and therefore would not substantially obstruct long-range views. Views of boats would continue to be a component of the visual landscape at the marina, and the potential increase in boat size would not substantially degrade or obstruct important scenic views.

As illustrated in the simulations, short-range views could reflect the larger craft that may moor in the marina under project conditions, but mid-range views of Fort Mason and long-range views of the Golden Gate Bridge, Angel Island, Alcatraz Island, and the Marin Headlands would remain essentially the same. For these reasons, the proposed project would not substantially degrade or obstruct any scenic views from public places.

VISUAL CHARACTER

The project would renovate the currently vacant, 700-square-foot Degaussing Station for use as the Harbor Office. The project would not alter the Degaussing Station's footprint and would not add square footage to the building. The project would alter the appearance of the Degaussing Station by removing the fencing surrounding the building, enclosing its porch (to serve as an entry vestibule), and adding a new egress (these changes to the entry are not apparent in simulations included in this EIR). Other renovations would be limited to the interior of the building. As such, the appearance of the future Harbor Office in existing views from the Marina Green, Fair's Seawall, Marina Boulevard, and Fort Mason Center would not be substantially altered under project conditions.

The proposed maintenance building and exterior modifications to the East Harbor restroom would incorporate design elements of existing onsite buildings, including details of fenestration, color, and building materials. The proposed project would not result in substantial, adverse visual changes, since improvements would generally be consistent with the visual character of the marina. Both the size and orientation of boats and breakwaters would be generally characteristic of the existing marine setting and would not substantially obstruct views from public vantage points.

In sum, the proposed project includes limited additions to and renovations of existing onsite structures in an area already developed with maritime uses. As described above, the project would alter some short- and long-range views from public viewing locations on the site and in its vicinity, including views from the Marina Green, Fort Mason, and neighboring streets. However, the site's use as a harbor and its associated maritime character would continue under project conditions. Moreover, the project's proposed public-access improvements could enhance the character of the site and its surroundings by allowing for greater access to portions of the site that are currently not available, such as on the East Harbor breakwater. This improved access could allow for greater public enjoyment of the site and surroundings, providing additional opportunities for scenic vistas from areas not currently accessible to pedestrians.

Although visual quality is subjective, it can reasonably be concluded that the proposed project would not result in a substantial, demonstrable negative aesthetic effect on the visual character or quality of the area and its surroundings.

CUMULATIVE EFFECTS

Cumulative impacts occur when impacts from a proposed project combine with impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. Seven projects are currently in various stages of planning or environmental review in the vicinity of the San Francisco Marina, and these projects are considered "reasonably foreseeable" for purposes of the analysis of cumulative aesthetic impacts. These projects include: (1) the Fort Mason Center Long Term Lease; (2) the Doyle Drive Replacement Project; (3) the Muni E-Line Extension to Fort Mason; (4) the Presidio Trust Management Plan; (5) the Crissy Field Marsh Expansion; (6) the Tennessee Hollow Restoration Project; and (7) the Ferry Access Study. Of these projects, the Muni E-Line Extension project would have the greatest potential to result in cumulative visual effects at and immediately adjacent to the project site.

The E-Line Extension project would extend rail service beyond the E-Line's current terminus at Beach and Jones Streets to the Presidio, using the historic railroad tunnel beneath Fort Mason to reach a new western terminus near the intersection of Laguna and Beach Streets. As currently envisioned, the E-Line Extension project would be completed in two Phases. Phase 1 proposes one of two turnaround concepts at the end of the Fort Mason tunnel: one within Fort Mason Center and one on city property. The latter concept would remove some parking to the south of Marina Boulevard in the East Harbor parking lot. Phase 2 would extend the E-Line farther west to the Presidio, either along Marina Boulevard entirely, or along Beach and Cervantes Streets and a shorter stretch of Marina Boulevard.

The onsite visual changes attributable to Phases 1 and 2 of this project would include the addition of physical elements to the East Harbor parking lot associated with transportation infrastructure: overhead wires for streetcars, temporary and permanent passenger platforms, signage, and restriping and reorganization of parking areas. Historic street cars would also be visible. The turnaround and passenger platforms would be constructed in an area of the site where surface parking currently exists. The design of the platforms and signage would be regulated by future

project-specific design guidelines. The addition of transit infrastructure and future E-Line service would not be visually incompatible with the existing automobile and transportation uses on the site of the proposed turnaround (Phase 1), nor would Phase 2 with extended E-Line service to the Presidio be incompatible with the existing automobile and transportation uses of Marina Boulevard. Moreover, such transit uses would not substantially degrade the existing visual quality or character of the project site or its vicinity, as similar transit uses are already present along the Embarcadero, Fisherman's Wharf, and in other bayfront and maritime settings.

Thus, the addition of transit use to the project area, as well as changes envisioned as part of the proposed project, would not result in a demonstrative negative visual effect, and cumulative impacts are expected to be less than significant.

C. HISTORIC RESOURCES

Based on the conclusions of the Initial Study (see Appendix A), the proposed project could affect known historic architectural resources, as well as historic architectural resources that may be eligible for listing in federal, state, or local historical listings, both within and adjacent to the project site. These issues are therefore discussed in the EIR. The Initial Study concluded that the proposed project would have a less-than-significant impact to prehistoric and historic archaeological resources with implementation of Mitigation Measure 4, p. 73. Therefore, this topic is not discussed in the EIR.

SETTING

This section focuses on potential impacts to historic architectural resources. The setting for historic resources has been summarized from the technical report prepared for this project (Carey & Co., 2004). Impacts to archaeological resources have been determined to be less than significant and are discussed in the Initial Study provided in Appendix A.

Historically, the project area was within the irregular, marshy shoreline margins of San Francisco Bay. The current land mass occupied by the project site was created by artificial fill dating from 1895 to 1906, and then by hydraulic fill deposited from 1912 to 1917 (Treadwell and Rollo, 1997). To retain the artificial fill, a seawall was built by dumping rock from a pile-supported trestle along the approximately 1,900-foot northern border of the future Marina Green. This manmade land mass formed the northern portion of the 635-acre setting for the 1915 Panama-Pacific International Exposition. Portions of this seawall exist today, while other parts were expanded later to form what is referred to in this document as the Fair's Seawall. Constructed for the fair, the present-day Marina Green was called the "North Gardens," and portions of what is now the inner basin of the West Harbor was called the "Boat Harbor," as shown on Exposition maps from 1915. The maps also show ferry slips at the outer edge of Gashouse Cove, the future site of the East Harbor. The area inland from the cove was occupied by the San Francisco Gas Light Company (hence the name "Gashouse Cove") and was excluded from the fairgrounds. After the fair, the exhibition halls were torn down (with the exception of the Palace of Fine Arts), and the area south of Marina Boulevard was subdivided for residential construction, which continued into the 1920s and 1930s. The Marina Green became a public park after a brief stint as a landing strip for transcontinental airmail service in 1920 and 1921. In 1925, the Board of Park Commissioners approved plans to enlarge the area of the West Harbor, then called the "Yacht Harbor," including an outer breakwater extending from the St. Francis Spit, an extended seawall, a new riprap seawall on the inside harbor, and harbor dredging. The San Francisco Yacht Club built its clubhouse on the St. Francis Spit in 1927, and the construction of improvements in this area, including restrooms and a concession stand, continued until 1928. In 1931, construction of a miniature stone lighthouse to the east of the yacht club was completed to mark the former entrance of the harbor.

Despite the Depression, San Francisco witnessed a growing interest in boating during the early 1930s. With local groups encouraging the Park Commissioners and with the creation of the federal Works Progress Administration (WPA) in April 1935, the Board planned to expand the West Harbor (yacht harbor) yet again, including the construction of new seawall along the northern edge of Marina Boulevard, between Scott and Baker Streets. (This other seawall is referred to as the “Marina Boulevard Seawall” in this document.) In February 1936, the WPA approved San Francisco’s proposal to expand and replace portions of the Fair’s Seawall along the Marina Green, construct a Harbor Office, construct an underground “convenience station” (i.e., restroom/changing room), and pave the driveways that surround the Marina Green. All WPA improvements were completed by 1938. In 1943, the Department of the Navy built the Degaussing Station adjacent to the Marina Green.

During the 1950s, the Recreation and Park Department completed the first approved master plan for the development and enlargement of the yacht harbor and saw the construction to completion with financial assistance from a 1955 bond issue. In 1958, construction was started to provide a new 100-foot-wide entrance channel for the (west) harbor by cutting into the embankment at the foot of Scott Street and building a rubble-filled, 1,100-foot-long breakwater (now called the outer jetty or north jetty) extending east from the former harbor entrance.

In 1963, the state legislature approved the conveyance of three parcels of state-owned land to the City and County of San Francisco, generally encompassing the land and water north of Marina Boulevard from Laguna to Lyon Streets, including the entire West Harbor, East Harbor, and the Marina Green. Between 1964 and 1966, the Recreation and Park Department completed an extensive enlargement of the marina by constructing a new harbor at Gashouse Cove, now called the East Harbor, and by carrying out major repairs and improvements to the seawall and piers at the West Harbor. Construction was completed by March 1966, at which time the number of docking berths had been increased from 257 to 680, 329 of which were located at Gashouse Cove and 351 at the original (west) harbor.¹ The 1970s saw the addition of the East Harbor restrooms, a par course,² and public-access improvements. In the mid-1980s, the Degaussing Station was reconstructed by the Navy in the same location and was later decommissioned. The wave organ, an art installation at the end of the outer jetty, was constructed in 1986 by the Exploratorium.³ Aside from ongoing maintenance and repair due to storm damage, no other physical changes to the marina have occurred to date.

¹ The number of berths has since been reduced due to storm damage and shoaling; currently, there are 326 berths in the West Harbor and 342 berths at the East Harbor.

² In the East Harbor open space area, not within the Marina Green.

³ The wave organ, just outside of the project area, makes musical sounds when the motion of the water resonates in the pipes. It was designed by George Gonzalez, a Bolinas-based artist, and Peter Richards, the assistant director the Exploratorium Museum.

RATED BUILDINGS OF ARCHITECTURAL AND HISTORIC IMPORTANCE

National Register of Historic Places / California Register of Historical Resources

No facilities at the marina are listed in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR), nor are they listed in the Directory of Properties in the Historic Property Data File for San Francisco County, which is maintained by the California Office of Historic Preservation. None of the buildings or structures at the marina have been previously surveyed or evaluated for their potential historic significance, with the exception of the former Degaussing Station, which the U.S. Navy evaluated in 1995 and determined ineligible for listing in the NRHP. The fact that the marina is not listed on either the NRHP or CRHR does not necessarily indicate a lack of historical importance. More likely, the site had never been comprehensively surveyed or nominated to either register.

Other Surveys

None of the facilities at the marina have been identified as city landmarks under Article 10 of the Planning Code, nor are they rated in the Planning Department's 1976 citywide survey of architecturally significant buildings. Furthermore, no marina facilities are included in *Here Today, San Francisco's Architectural Heritage*, the Junior League's 1968 book documenting the results of a five-year-long survey of historic buildings in San Francisco, San Mateo, and Marin Counties.

Project Site

In a survey commissioned in 2003 by the City and County of San Francisco for this EIR, a few buildings or structures in the project area were identified as potentially eligible for listing on the NRHP or the CRHR or for designation as San Francisco landmarks (Carey & Co., 2004). In 2004, Carey & Co. re-evaluated the former Degaussing Station and several other structures and buildings at and adjacent to the project site for historic significance according to federal, state, and local criteria, as well as for historic district eligibility, and to determine if the proposed project would cause a change in the significance of any existing or eligible historic resources.

Carey & Co. evaluated nine buildings or structures at the project site (the Harbor Office, the former Degaussing Station, Fair's Seawall, East Harbor breakwater, East Harbor restroom, West Harbor jetty, marina docks and slips, West Harbor restroom, and the concession stand in the West Harbor) and two resources outside of but adjacent to the project site (Marina Green and the West Harbor lighthouse). Neither the St. Francis Yacht Club nor the Golden Gate Yacht Club were evaluated because they are not old enough to qualify as historic resources, nor would they be considered "exceptionally significant."⁴

⁴ The original St. Francis Yacht Club, built in 1927, was entirely rebuilt in 1977 after a devastating fire. The Golden Gate Yacht Club was constructed in the 1960s and has undergone a series of remodeling efforts since that time. Due to their relatively recent construction dates, neither structure would likely qualify for listing at national, state, or local levels. Under some circumstances, buildings or structures less than 50 years old may qualify as historic resources if

Four resources in the project area have been identified as historic resources for CEQA purposes. Carey & Co. concluded that two of these resources, the Fair's Seawall and the concession stand in the West Harbor, possess historic significance and sufficient physical integrity to qualify as historic resources at the federal and state levels. The Planning Department found that two other resources in the project area, the Harbor Office and the West Harbor restrooms, may also have historic significance at the local level. These findings are summarized below.

Fair's Seawall

The Fair's Seawall retains the northern side of the Marina Green and linear parking lot and was constructed in phases until 1938. The Fair's Seawall replaced portions of earlier seawalls at this location that were originally built for the 1915 Panama-Pacific International Exposition and before. Under NRHP/CRHR Criterion A/1 (association with a historical event), the Fair's Seawall appears to have historic significance for its direct relationship with the WPA improvement program undertaken in San Francisco during the Great Depression and has retained sufficient physical integrity to be eligible for listing on the NRHP and CRHR and as a city landmark.⁵ As a result, this structure is considered a historic resource for CEQA purposes.

Concession Stand

The concession stand, a small, one-story structure located at the western end of the West Harbor, was constructed in 1938. Under NRHP/CRHR Criterion A/1 (association with a historical event), the stand appears to have historic significance for its direct relationship with the WPA improvement program undertaken in San Francisco during the Great Depression. As a result, this building is considered a historic resource for CEQA purposes.

West Harbor Restroom

Carey & Co. concluded that the West Harbor restroom, constructed circa 1927, lacks sufficient historic significance to be eligible for listing in the NRHP or CRHR or for designation as a local landmark. However, a Planning Department preservation technical specialist determined that the West Harbor restroom meets CRHR Criterion I (association with a historical event) due to its association with the City's development of the marina and as a locally funded public works project that was a predecessor of the WPA era (Simonson, 2004). Therefore, this building is considered a historic resource for CEQA purposes.

Harbor Office

The Harbor Office was originally constructed in 1938 as part of a Depression-era federal assistance program in San Francisco. The building was expanded in 1963 when the yacht harbor

they are exceptionally significant, exhibiting strong associations with more recent historic events. Examples include Cape Canaveral in Florida, and many Cold War-era missile sites. Such properties are exceedingly rare, and neither the St. Francis nor Golden Gate Yacht Clubs would likely qualify as being exceptionally historically significant.

⁵ Although referred to as the "Fair's Seawall," it was not found to be historically significant for its previous association with the Panama-Pacific International Exposition, because it does not retain sufficient integrity from this time period, primarily due to the numerous alterations that occurred after 1915.

was enlarged. The nature of this expansion led Carey & Co. to conclude that the building “is permanently and essentially different from what existed in 1938,” and that it therefore did not meet the integrity thresholds necessary for listing in the NRHP or CRHR or for designation as a local landmark. However, the Planning Department noted that the building would become eligible for listing in the NRHP/CRHR, for designation as a city landmark, and as a contributor to a potential future West Harbor Cultural Landscape when the 1963 building additions to the West Harbor restroom reach 50 years old (Simonson, 2004). As a result, this building is treated as a historic resource for CEQA purposes.

The remainder of the resources evaluated in the project area, as well as the grouping as a whole, do not possess sufficient historic significance and physical integrity for listing in the NRHP or CRHR or for designation as a city landmark (Carey & Co., 2004). These include the East Harbor restrooms or any other facilities in the East Harbor, the West Harbor jetty, other seawall portions in the West Harbor, the former U.S. Navy Degaussing Station, and the docks and slips.

Finally, the Planning Department’s preservation technical specialist identified the West Harbor as a potential “cultural landscape,” as many of its human-made landscape features and elements were constructed over 50 years ago and formed a relatively important aspect of the City’s recreational history (Simonson, 2004). However, a substantial amount of additional research and evaluations of every landscape element in the West Harbor, both inside and outside of the project area, would be required to confirm whether the area qualifies as such, and this level of assessment was beyond the scope of the Carey & Co. report prepared for this project. Even if the West Harbor were determined to be a cultural landscape upon further research, the relatively minor physical changes to the individual historic resources within the West Harbor would not be sufficient to disqualify the area as a potential cultural landscape. Due to its relatively recent date of construction, the East Harbor would not likely contribute to a potential cultural landscape, even with additional research.

Project Vicinity

The following buildings, structures, or landscape elements outside of the project area but in the project vicinity were identified by Carey & Co. as historic resources for CEQA purposes.

Marina Green

The Marina Green was constructed in 1915 as a landscape element of the Panama-Pacific International Exposition and briefly became a landing strip for transcontinental airmail flights in the 1920s. Structures on the Marina Green include a flagpole (1936) and an Art Deco–style granite monument on the northern edge of the lawn (1941). Although not located within the project site, the Marina Green is immediately adjacent to the East and West Harbors. Under NRHP/CRHR Criterion A/1 (association with a historical event), the Marina Green appears to have historic significance as the site of the first transcontinental airmail flights. Therefore, this landscape element is considered a historic resource for CEQA purposes.

West Harbor Lighthouse

The West Harbor lighthouse, a miniature stone lighthouse located on the West Harbor jetty, was constructed in 1931 to mark the former entrance to the West Harbor. The resource appears to have historic significance, but lacks sufficient physical integrity to be eligible for listing on the NRHP. However, this structure may be eligible for the CRHR under Criterion 3 (distinctive architecture) and as a local landmark, because it possesses high artistic value in its stone detailing and because of its diminutive size. As a result, this structure is considered a historic resource for CEQA purposes.

Fort Mason

- To the east of the San Francisco Marina is Fort Mason. Fort Mason was used by the military as a defensive site by colonial Spain 200 years ago, and subsequently by the United States. Fort Mason became part of the GGNRA in 1972. Fort Mason was established as a national historic district in 1972; the district expanded in 1979; San Francisco Port of Embarkation National Historic Landmark was established in 1985, including Lower Fort Mason, its three piers, and associated structures. The Fort Mason Historic District is also San Francisco Landmark #13.

Construction of the northwest portion of Fort Mason, known as Lower Fort Mason, predated construction of the East Harbor. In 1910, land that was then underwater was acquired, and construction began to fill in the area and construct pilings and piers. Pier 1, immediately east of what is now the East Harbor, was constructed in 1912, and the pier shed was built above it in 1917, although the shed was replaced with a reconstruction in 1934. Building A and the entrance gate and wall were also erected in 1934. All of these structures, including the adjacent Piers 2 and 3 and associated sheds, are contributing resources to the San Francisco Port of Embarkation National Historic Landmark District and to a potential Lower Fort Mason cultural landscape (NPS/GGNRA, 2004). Fort Mason has been automatically listed to the CRHR by virtue of its NRHP status. Upper Fort Mason is also listed in the national historic district.

San Francisco Maritime National Historic Park

Further east from Fort Mason is the San Francisco Maritime National Historic Park, listed in the NRHP in 1988 and administered by the National Park Service. The park includes the Hyde Street Pier and Aquatic Park, located roughly at Hyde Street and the western end of Jefferson Street. The Maritime National Historic Park also includes the San Francisco Maritime Museum, expansive green space with benches, trees, and walkways, and the terminus of the Powell-Hyde cable car line.

Palace of Fine Arts

One other notable historic resource in the project vicinity is the Palace of Fine Arts, designed by renowned local architect Bernard Maybeck; it is the only surviving architectural remnant from the 1915 Panama-Pacific International Exposition. This building is San Francisco Landmark #88 and

is rated 7J⁶ in the CRHR. This historic resource is on Baker Street between Bay and Jefferson Streets, about 600 feet south from the marina's West Harbor. Portions of the Palace of Fine Arts, including the dome and the Exploratorium, are visible from the marina.

IMPACTS

SIGNIFICANCE CRITERIA

In accordance with CEQA Guidelines Section 21084.1, a project is normally found to have a significant effect on the environment if it would result in a substantial adverse change to a property of historic significance. A historical resource is defined as one that is listed in, or determined eligible for listing in, the CRHR, one that is identified as significant in a local register of historic resources (such as Article 10 of the San Francisco Planning Code), or one that is deemed significant due to its identification in a historical resource survey meeting the requirements of Public Resources Code Section 5024.1(g). A resource that is deemed significant under Public Resources Code Section 5024.1(g) is presumed to be historically significant unless a preponderance of evidence demonstrates otherwise.

A "substantial adverse change" is defined by CEQA Guidelines Section 15064.5 as "demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The significance of a historical resource is "materially impaired," according to CEQA Guidelines Section 15064(b)(2), when a project would demolish or materially alter, in an adverse manner, those physical characteristics of the resource that:

- Convey its historic significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR (including a determination by the lead agency that the resource is eligible for inclusion in the CRHR);
- Account for its inclusion in a local register of historical resources adopted by local agency ordinance or resolution (in accordance with Public Resources Code Section 5020.1[k]); or
- Account for its identification in a historical resources survey that meets the requirements of Public Resources Code Section 5024.1(g), including, among other things, that "the resource is evaluated and determined by the [State Office of Historic Preservation] to have a significance rating of Category 1 to 5 on the [Department of Parks and Recreation] Form 523," unless the lead agency "establishes by a preponderance of evidence that the resource is not historically or culturally significant."

Generally, a project that follows the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings (Standards)* (Weeks and Grimmer, 1995) is considered to have mitigated impacts on the historic resources to a less-than-significant level (CEQA Guidelines Section 15064.5[b][3]).

⁶ Rating of "7J" = received by the State Office of Historic Preservation but not yet evaluated for the NRHP or the CRHR. Nonetheless, for CEQA purposes, this structure is considered a historic resource due to its listing on the local register.

IMPACTS

Project Site

According to the Carey & Co. technical report, two buildings on the project site would qualify as historic resources under CEQA criteria: the Fair's Seawall and the concession stand in the West Harbor. The Planning Department also found that the Harbor Office and the West Harbor restroom may qualify under CEQA as historic resources. Outside of the project site but in the immediate project vicinity, the Marina Green, the West Harbor lighthouse, the San Francisco Port of Embarkation National Historic Landmark District, the San Francisco Maritime National Historic Park, and the Palace of Fine Arts are also considered historic resources for CEQA purposes.

The remainder of the buildings or structures evaluated, as well as the grouping as a whole, do not possess sufficient historic significance and physical integrity for listing in the NRHP or CRHR or for designation as a city landmark or a cultural landscape (Carey & Co., 2004); thus, any impacts resulting from alterations to these properties under the proposed project would be less than significant.

The proposed project would not alter the concession stand or lighthouse and thus would not result in impacts to these potentially eligible historic resources. Interior renovations to the West Harbor restroom were also found to have no significant impacts to this potentially eligible historic resource. However, the proposed project could adversely affect the historic significance of the Fair's Seawall and the Harbor Office and could alter the setting of adjacent historic resources, such as the San Francisco Port of Embarkation National Historic Landmark District. As noted before, the Marina Green and lighthouse are adjacent to, but not within, the project site. Potential impacts to these historic resources are described below.

Fair's Seawall

The proposed project would construct a new breakwater and ADA-compliant ramp in the outer basin of the West Harbor that would abut the Fair's Seawall. The breakwater would be perpendicular to the seawall and would extend about 200 feet into the outer basin of the West Harbor, likely attaching to the face of the seawall for about 15 to 20 feet. In addition, the new ramp would descend from the top of the seawall to a new floating dock, to be constructed below and about 20 feet to the north of the seawall. These improvements are illustrated in Figure 8, p. III.B-11, in Section III.B, Visual and Aesthetic Resources. An existing stone staircase descends from the top of the seawall into the water in the approximate location of these improvements. As the final designs for the breakwater and the ADA ramp have not been completed, it is possible that these improvements could damage or substantially alter the Fair's Seawall, including its sloped, cobblestone face and possibly one of its stone staircases, both of which are considered character-defining features of this resource. Substantial alteration to a historically significant resource is considered a potentially significant impact under CEQA. Mitigation Measure HIST-1 requires that the new West Harbor breakwater and access ramps be designed in accordance with the *Standards*, which would reduce the impact to a less-than-significant level (see Chapter IV,

Mitigation and Improvement Measures, p. IV-2). In accordance with the *Standards*, the breakwater should be designed so that it is compatible with the historic seawall (in terms of materials, massing, and scale), yet clearly differentiated from the seawall (in terms of design). Also, the new breakwater and access ramps would need to be constructed so that, if removed in the future, they would not damage the seawall structure or its cobblestone facing.

Another potential impact to the seawall is exposure to wave action due to removal of the north-south mole at the foot of Scott Street. This potential impact is described in detail in Section III.D, Soils, Geology, and Seismicity, and reiterated here. According to the engineering report, the seawall could be exposed to wave action at the location where the north-south mole would be removed. Although the amount of wave action in this area would not likely be sufficient to make the seawall more susceptible to structural failure, in some cases damage could occur, which would constitute a significant impact to this historic resource. Mitigation Measure GEO-2 requires installation of toe protection, periodic visual inspections of this portion of the seawall, and prompt repair of identified structural defects due to wave action (see Chapter IV, Mitigation and Improvement Measures, p. IV-4). Implementation of Mitigation Measure GEO-2 would reduce potential impacts to the historic seawall to a less-than-significant level.

Neither the north-south nor the east-west moles were identified as historic resources in the historic resources evaluation report (Carey & Co., 2004), and their removal would therefore be a less-than-significant impact under CEQA. The north-south mole, in particular, is a much later addition to the West Harbor, and its removal from the face of the Fair's Seawall would help to restore this historic resource more closely to its original WPA-era appearance. Therefore, removal of this mole itself would not adversely affect the historic integrity of the Fair's Seawall. The east-west mole is a remnant feature from the Pacific-Panama International Exposition, but is not considered an individually eligible historic resource for this association. Its proposed truncation would be a less-than-significant impact under CEQA.

Harbor Office

Under the proposed project, the interior of the Harbor Office would be adapted for restroom uses only; two public restrooms would be located on the eastern end of the building, and two restrooms for marina tenants on the western end, separated in the center by a wall. This renovation would occur primarily on the interior of the building and would be completed in accordance with ADA requirements. While interior alterations to historic resources are typically not considered an impact under CEQA (unless significant, character-defining interior features have been identified), the renovation activities could substantially alter portions of the building that are visible from the exterior, including: (1) infilling three existing doorways with unknown wall materials; (2) infilling three original 1938-era windows on the north-facing façade with unknown wall materials; and (3) cutting two new doorways into cobblestone cladding, including one on the south-facing façade and one on the north-facing façade. The Planning Department has stated that the proposed project could impair the integrity of the building and affect the possible future creation of a historic district or cultural landscape (Simonson, 2004). Changes to the exterior of the Harbor Office would result in a potentially significant impact to historic resources

under CEQA. Mitigation to reduce the impact to a less-than-significant level is described under Mitigation Measure HIST-2 (see Chapter IV, Mitigation and Improvement Measures, p. IV-2). This measure requires that the interior renovations to the Harbor Office be designed in accordance with the *Standards*. A feasible design that meets the *Standards* would strive to retain the original front doorway to the Harbor Office, retains all original multi-pane wood-frame windows on the west- and north-facing elevations, and retains the recessed entrance on the eastern side of the building.

Project Vicinity

Marina Green

The proposed project would not result in direct effects to the Marina Green, as this historic resource is located outside of the project area, and no changes are proposed to it. Potentially significant indirect effects to the Marina Green could occur if the project included substantial alterations to the immediate historic setting of the Marina Green, such that it would no longer qualify as a historic resource. Physical changes due to the proposed project that would be visible from most locations within the Marina Green, and that have the potential to alter its setting, include the new breakwaters and replacement slips and docks in the West Harbor, potentially larger and reoriented boats in the inner basin of the West Harbor, removal of the fencing around the exterior of the Degaussing Station, construction of a new maintenance building, and expansion of the restrooms in the East Harbor open space area. Waterside changes in the East Harbor would not likely be visible from the Marina Green, given the distance between this area and the harbor, as well as the fact that most of the improvements would be at sea level and thus below the line of sight. As described in Section III.B, Visual and Aesthetic Resources, the proposed project would not have a demonstrable negative aesthetic effect, nor would it substantially degrade or obstruct scenic views from public areas, including the Marina Green. The new maintenance building and expanded restrooms in the East Harbor open space area would be noticeable from only the easternmost portions of the Marina Green and would not constitute a significant visual change in the open space area. Therefore, the historic setting of the Marina Green would not be substantially altered to the extent that it would no longer qualify as a historic resource, and no significant impact would occur.

West Harbor Lighthouse

The proposed project would not result in direct effects to the West Harbor lighthouse, as this historic resource is located outside of the project area, and no changes are proposed to it. Potentially significant indirect effects to the lighthouse could occur if the project included substantial alterations to the immediate historic setting of the structure, such that it would no longer qualify as a historic resource. Physical changes due to the proposed project that would be visible from the lighthouse, and that have the potential to alter its setting, include the new breakwaters and replacement slips and docks in the West Harbor, potentially larger and reoriented boats in the inner basin of the West Harbor, and (from certain vantage points) the proposed riprap along the southern edge of the north jetty. Changes in the East Harbor would not likely be visible from the lighthouse, given the distance between this area and the harbor, as well as the fact that

most of the improvements would be at sea level and therefore below the line of sight. As described in Section III.B, Visual and Aesthetic Resources, the proposed project would not have a demonstrable negative aesthetic effect, nor would it substantially degrade or obstruct scenic views from public areas. Therefore, the historic setting of the West Harbor lighthouse would not be substantially altered to the extent that it would no longer qualify as a historic resource, and no significant impact would occur.

Fort Mason

Proposed project components in the East Harbor have the potential to alter the historic setting of the San Francisco Port of Embarkation National Historic Landmark District, which includes Pier 1 and the western entrance to Lower Fort Mason. Project components in the vicinity of Lower Fort Mason include a new floating breakwater in the East Harbor immediately west and parallel to Pier 1, replacement of docks and slips, new lighting, as well as renovations to the boat hoist and resulting reuse of the adjacent parking area for trailered boat storage. As none of these project components have been designed in detail, it is possible that they could be incompatible with the maritime-industrial character of the San Francisco Port of Embarkation National Historic Landmark District, thereby potentially affecting the historic setting.

Carey & Co. determined that proposed project features in the East Harbor would not be incompatible with the adjacent historic resource to the extent that its significance as a national, state, or local historic resource would be materially impaired. As a result, the proposed project would have a less-than-significant impact on Fort Mason. Nevertheless, the project sponsor has agreed to implement design guidelines intended to preserve existing views and manage the massing, scale, site coverage, articulation, and character of new development at the marina. These guidelines are described as Improvement Measure HIST-1 (see Chapter IV, Mitigation and Improvement Measures, p. IV-6). The design guidelines, which are listed in Appendix B, seek to maintain the distinctive maritime-industrial character of the San Francisco Port of Embarkation National Historic Landmark District at Fort Mason. The guidelines have been prepared with input from the National Park Service/Golden Gate National Recreation Area and are generally consistent with the *Standards*.

Construction of a new floating breakwater in the East Harbor parallel to, and 10 to 20 feet from, Pier 1 at Fort Mason Center could have vibration and/or liquefaction impacts, potentially damaging this historic resource. Vibration and/or liquefaction impacts would occur primarily from pile driving to install the new breakwater. Pile driving could weaken the adjacent pier, which has known structural deficiencies. In addition, wave energies from a new floating breakwater in the East Harbor could be directed toward the substructure of the adjacent Pier 1 facility, potentially damaging or weakening this historic resource.

The potential effect of a new floating breakwater on the substructure of Pier 1 was evaluated in a technical report prepared for this EIR (Moffatt & Nichol, 2004) (see Appendix C). This report was peer-reviewed by an independent engineering firm (Coast & Harbor Engineering, 2004), which confirmed the report's findings. The findings of this report are summarized in Section

III.D, Soils, Geology, and Seismicity, of this EIR. As described in Section III.D, the specific vibration-related impacts to Pier 1 cannot be quantified until further design details for the proposed floating breakwater become available. Due to the uncertainty regarding vibration impacts to Pier 1, they are assumed to be potentially significant. Mitigation Measure GEO-4 (Chapter IV, Mitigation and Improvement Measures, p. IV-4) would require the performance of a preconstruction geotechnical investigation and pile design analysis to evaluate various pile types and driving effects. The measure also requires the selection of appropriate construction techniques and pile materials to reduce soil vibration. For example, pile-driving vibration can be significantly reduced by predrilling or water-jetting the holes prior to pile driving, using resonance-free vibratory hammers during pile driving, and selecting hollow steel piles instead of solid concrete. If warranted by the analysis, a test pile program would measure underwater vibration as well as piling deflections. If alternative pile types or installation methods would not be effective in minimizing vibration and/or liquefaction hazards, the project sponsor would conduct vibration monitoring of Pier 1 and associated structures. If construction vibration exceeded an acceptable structural threshold, pile-driving activities would cease until an alternative plan could be devised. Finally, if no additional alternative pile type or installation methods exist, beyond those discussed above, to reduce the vibration from pile driving to an acceptable level, the breakwater in the East Harbor would be constructed after structural improvements to Pier 1 have been completed. Implementation of these measures would reduce vibration impacts to Pier 1 to a less-than-significant level.

As described further in Section III.D, potential wave loads on Pier 1 could increase due to reflected wave energies from the proposed floating breakwater. However, the engineering report determined that this increase would be well within the structural capacity of Pier 1 to absorb wave loads, including during storm events (see Appendix C). As a result, potential impacts to Pier 1 from breakwater wave attenuation would be less than significant.

San Francisco Maritime National Historic Park

The San Francisco Maritime National Historic Park is about 2,000 feet east of the marina's East Harbor, separated by the structures and landforms of Fort Mason. Given local topography and intervening properties, the project site is not visible from this park. As no physical changes to the project site would be visible from this historic resource, there would be no significant indirect impact to its historic setting.

Palace of Fine Arts

The Palace of Fine Arts, a San Francisco landmark, is about 600 feet south from the southwestern corner of the marina's West Harbor. Portions of the West Harbor are visible from the northeastern edge of the Palace of Fine Arts. The most noticeable changes to the West Harbor near this historical landmark would be new slips, docks, and the pilings that anchor them. These changes would be below the seawall running parallel to Marina Boulevard and therefore would not be visible from the historic resource. Some of the slips closest to the Palace of Fine Arts would be somewhat larger on average than the slips that are now present in this location and could accommodate somewhat larger boats. Most of these boats would be sailboats, which could have

slightly taller masts than the boats that are moored there now. The hulls of any larger sailboats or other types of boats, such as yachts, could be partially visible from this distance. The overall degree of visual change in this area would not be sufficient to cause a significant impact to the historic setting of the Palace of Fine Arts, such that it would no longer qualify as a San Francisco landmark. Therefore, the proposed project would have a less-than-significant impact on the setting of this historic resource.

CUMULATIVE IMPACTS

Other projects in the vicinity of the proposed project that could result in cumulative impacts include renovations to Pier 1 at Fort Mason (as part of the Fort Mason Long Term Lease) and the Muni E-Line Extension to Fort Mason. Renovations to Pier 1, a contributing resource to the San Francisco Port of Embarkation National Historic Landmark District, would include seismic strengthening of the pier, much of which would be invisible from the exterior or only minimally visible from the concrete pilings that support the building. Because Pier 1 is a NRHP resource, the National Park Service would be required to renovate the pier consistent with the *Standards*, thereby avoiding potential impacts to this historic structure. As no significant impacts to historic resources associated with the proposed project (that cannot be mitigated to a less-than-significant level) have been identified, nor would there be any significant impacts to Pier 1, no significant cumulative impacts are expected.

As described in Section III.B, Visual and Aesthetic Resources, the proposed Muni E-Line Extension project would extend rail service beyond the E-Line's current terminus at Beach and Jones Streets to the Presidio, using the historic railroad tunnel beneath Fort Mason to reach a new western terminus near the intersection of Laguna and Beach Streets (Phase 1). As currently envisioned, Phase 1 of the project would implement one of two turnaround concepts for the end of the Fort Mason tunnel: one within the Fort Mason Center parking lot, and the other on City property in the East Harbor parking lot. Phase 2 would extend the E-Line farther west to the Presidio, either along Marina Boulevard entirely, or along Beach and Cervantes Streets and a shorter stretch of Marina Boulevard.

Changes to the historic setting of the National Historic Landmark District attributable to Phase 1 of the Muni project include the addition of physical elements, such as overhead wires for streetcars, rails embedded in pavement, temporary and permanent passenger platforms, signage, and restriping and reorganization of parking areas (either within the Fort Mason Center parking lot or in the East Harbor parking lot, depending on which turnaround concept is selected). Historic streetcars would also be visible in these areas.

The turnaround and passenger platforms would be constructed in areas of either site where transportation uses and infrastructure (surface parking and roadways) currently exist. The platforms and signage would be designed according to typical engineering standards if more site-specific design guidelines were not adopted, as would likely be the case for improvements within Fort Mason. As such, the addition of transit infrastructure and future E-Line service would not be incompatible with the maritime-industrial setting of the National Historic Landmark District.

Finally, the visual change in this area attributable to the Muni project would not likely combine with potential effects to historic resources associated with the proposed project, as the latter effects would be located in the West Harbor, which is physically separated from Fort Mason by approximately 2,400 feet, and can be mitigated to a less-than-significant level. No historic resources were identified in the East Harbor that could be affected by the Muni project.

Phase 2 of the Muni E-Line Extension would be constructed along existing rights-of-way within various portions of Marina Boulevard and would not cause direct impacts to historic resources, such as demolition or physical alterations. Physical changes associated with Phase 2 include installation of overhead wires for streetcars, rails embedded in pavement, platform structures, and historic streetcars. Phase 2 of the project would be farther away from the National Historic Landmark District than Phase 1, thereby further reducing the potential for alterations to its historic setting. In addition, the visual change along Marina Boulevard attributable to the Muni project would not likely combine with potential effects to historic resources associated with the proposed project, as these changes would be physically separated by approximately 300 feet, and can be mitigated to a less-than-significant level. For example, proposed interior changes to the Harbor Office, the closest historic resource to the proposed Muni line, would not be perceptible in combination with changes associated with Phase 2 of the E-Line project. Therefore, changes envisioned as part of the proposed project would not result in a significant cumulative impact to historic resources.

D. SOILS, GEOLOGY, AND SEISMICITY

Based on the conclusions of the Initial Study (see Appendix A), the proposed project could cause significant seismic and geologic impacts, including ground shaking and associated secondary effects, coastal erosion, offsite sedimentation, and effects on adjacent Fort Mason structures. These topics are therefore discussed in the EIR. The Initial Study concluded that the proposed project would have less-than-significant impacts associated with other seismic and geologic hazards, including surface rupture from faulting, landslides, dam inundation, and tsunamis. In addition, the project would not alter the topography or any unique geologic or physical features. Therefore, these topics are not discussed in the EIR.

SETTING

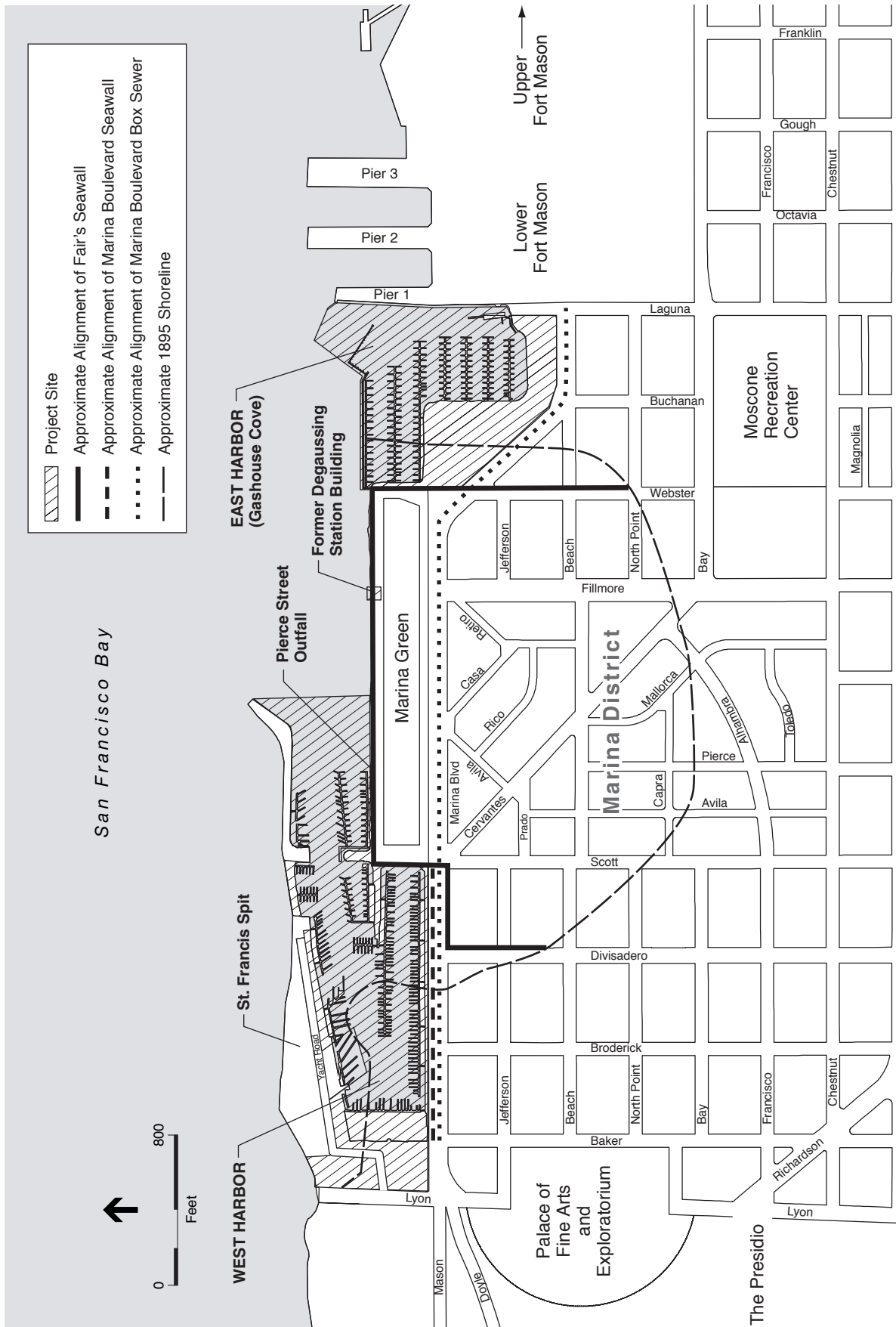
SITE GEOLOGY AND SEAWALLS

The project site is located in the former Marina Cove, a shallow bay that existed prior to filling of the area between 1851 and 1917. The approximate 1895 shoreline boundary of this cove is shown on Figure 11. There are two manmade seawalls that generally define the geography of the project site. Information regarding these seawalls was obtained from three documents prepared to assess liquefaction hazards in the Marina District (Harding Lawson Associates et al., 1991; Taylor et al., 1992; and Treadwell & Rollo, 1997). Information about the seawalls and their performance in previous seismic events is summarized below.

Fair's Seawall

The Fair's Seawall was built in the 1890s along the northern border of the present-day Marina Green to retain the fill placed in Marina Cove. The first seawall in this location, completed in 1894 and bordering the roughly 1,900-foot northern border of the Marina Green, was built by dumping rock from a pile-supported trestle. Dune sand, excavated and transported from outside the western boundaries of the Marina District, was dumped adjacent to the seawall, but filling of the cove was not completed at that time. By 1906, Marina Cove was enclosed, except for a narrow opening to the north. Filling behind the Fair's Seawall resumed in 1912 to create developable land for the 1915 Panama-Pacific International Exposition. The fill used at this time was largely hydraulic fill composed mainly of sand and silty sand dredged from the Bay. The fill was pumped into its current locations without any attempts at densification. Various extensions and replacements of this first seawall were completed in the 1930s as part of a public works improvement project.

The U.S. Geological Survey (USGS) has indicated that about 0.5 to 1 foot of vertical settlement occurred at the northeast corner of the Fair's Seawall, near the East Harbor, and 0.5 to 0.7 feet of settlement occurred at the Pierce Street sewer outfall (shown on Figure 11) as a result of the 1989 Loma Prieta earthquake (Taylor et al., 1992). The Fair's Seawall showed no evidence of uneven lateral movement or settlement, but a several-inch-wide crack was observed in the ground parallel to and about 30 to 50 feet behind the seawall. There were no reports regarding lateral movement



SOURCE: Environmental Science Associates; Harding Lawson Associates, 1991

Figure 11
Approximate Seawall Alignments

of the Fair's Seawall in the 1906 earthquake. In 1906, however, filling behind the seawall had not been completed, and the forces on the seawall were not likely as great as they would be for a similar earthquake today.

Marina Boulevard Seawall

The Marina Boulevard Seawall, constructed around 1934, is approximately 1,100 feet long and runs along the northern side of Marina Boulevard within the West Harbor, between Scott and Baker Streets (Figure 11). This nine-foot-high cantilever concrete wall has basalt rock facing and is supported on vertical and battered composite concrete and wood piles. The Marina Boulevard box sewer parallels the seawall near the northern curb line of Marina Boulevard and continues parallel to this roadway (Figure 11). The box sewer, part of the Northshore Outfalls Consolidation project, is a buried concrete structure that collects dry- and wet-weather flows from outfalls in the northshore area. The geologic materials present in the vicinity of the seawall include sand fill just below the water table, hydraulic fill, gravel and rock fill, and native sand.

According to the USGS, the sidewalk immediately north of Marina Boulevard between Baker and Scott Streets experienced 0.5 to 0.7 feet of vertical settlement as a result of the Loma Prieta earthquake (Taylor et al., 1992). About 1 to 2 feet of settlement occurred near the existing Harbor Office. The pavement surface slumped roughly 0.6 to 1 foot immediately north of a buried concrete box culvert near the bayward tip of Scott Street, and about 1 foot at the east end of the Marina Boulevard Seawall immediately south of the Harbor Office, although the seawall and the Harbor Office did not experience differential settlement. The seawall on the west side of the West Harbor was damaged due to lateral movement and settlement, although the Marina Boulevard Seawall showed no evidence of horizontal movement.

Southwest Corner and St. Francis Spit

The St. Francis Spit is a manmade body of land that extends north and east into the Bay. Only the northeast extension of the spit, the north jetty, is within the project area. Although the St. Francis Yacht Club and the lighthouse are located on the spit, they are not located within the project area. The southwestern corner of the site is underlain by beach sand deposits, which consist mostly of soft, loosely compacted, homogeneous sand. The spit was filled during the early 1900s through the 1930s. The observed lateral displacement caused by the 1989 earthquake at the St. Francis Spit was about 2 feet. Vertical settlement on the St. Francis Spit was generally less than 1 foot.

CURRENT VELOCITIES AND WAVE HEIGHTS

There are two daily tidal cycles in San Francisco Bay: two ebb tides (outgoing or falling tides) associated with two flood tides (incoming or rising tides) each day. These tidal cycles correspond with two high and two low water levels of varying heights. The average tide range is 6 feet. Tidal currents in the Bay occur primarily as a result of the changing tides, with a flood (or easterly) current associated with a rising tide, and an ebb (or westerly) current associated with a falling

tide. The velocity of the current depends on many factors, including the tidal stage and intensity of the tide, winds, and barometric conditions.

Results of modeling used to simulate current velocities and wave heights for existing conditions indicate that with a tidal current of approximately 0.7 to 1.0 meter per second offshore of the breakwaters, the current speed inside of the harbors is less than 0.1 meter per second (Moffat & Nichol, 2004). The maximum current speed at the eastern point of the outer jetty, in the approximate location of the wave organ, has been recorded at 0.9 meter per second.

Two types of waves that produce the most energy within the existing harbors were evaluated for the *San Francisco Marina Renovation Project Breakwater Improvement Study* conducted for the proposed project (Moffat & Nichol, 2004): local wind-generated waves originating from the northeast (and moving in a southwest direction),¹ and waves resulting from ocean swells originating from the northwest, outside of the Golden Gate (and moving in a southeast direction).² Under existing conditions, wave diffraction and the shallow sandbar around the eastern tip of the outer jetty dissipate the energy of waves entering the West Harbor. For example, the height of a wave coming from the northeast is reduced to 50 percent or less of the incident wave height along the Fair's Seawall. Within the inner basin of the West Harbor, the wave height is further reduced, to 20 percent or less of the incident wave height. For a wave coming from the northwest, approximately 25 percent of the incident wave height enters the harbor, primarily because the waves are longer and more dispersed. The East Harbor is currently exposed to northeast waves, with up to 100 percent of the original wave height entering parts of the harbor. Very little of the wave energy from the northwest direction leaks into the East Harbor because of the existing breakwater configuration.

SEDIMENTATION

Sedimentation is the transport and accumulation of sand, primarily from wave action, over time. In the project area, sediment transport generally moves from west to east. In the West Harbor, a portion of the transported sand is deposited around the tip of the outer jetty, while the balance goes back out to deeper water. There is also the potential for some sand deposition along the Fair's Seawall to the south. Sand deposition along the northern edge of the outer jetty has reached equilibrium, which in recent times has resulted in additional deposition around the tip of the jetty (Moffat & Nichol, 2004). Transport reversals (sand moving to the west) probably occur during local northeast storms. Sedimentation around the tip of the jetty and within other areas of the West Harbor has resulted in the need for periodic maintenance dredging.

Crissy Field, which is located within the Golden Gate National Recreation Area (GGNRA), is immediately west of the West Harbor. Tidal action was introduced into a restored, 20-acre tidal marsh at Crissy Field in 1999. The tidal marsh is about 2,000 feet west of the entrance to the

¹ For this wind-generated wave, the maximum energy was associated with a direction of 45 degrees azimuth (northeast) and a peak wave period of 5 seconds.

² For this northwest wave, the maximum energy is associated with a direction of 285 degrees azimuth (west) and a peak wave period of 10 seconds.

West Harbor. In May 2001, natural closure and breaching of the marsh occurred due to sand deposition in the inlet channel, which has continued to close and reopen intermittently since that time. Monitoring studies have estimated that the existing average sand transport rate at Crissy Field is 25,000 cubic yards of sand per year, towards the east (Moffatt & Nichol, 2004).

BAY GEOLOGY

The Bay floor is underlain by 12 to 59 feet of bay mud, which is composed of soft to medium-stiff silty clay; 0 to 50 feet of very dense silty and clayey sand; and 10 to 30 feet of very stiff old bay mud underlain by bedrock. The thickness of bay mud and old bay mud generally increases with distance from the shoreline, and the intervening silty and clayey sand decreases in thickness.

REGIONAL SEISMICITY

The San Francisco Bay Area is a region of high seismic activity because of faulting within the San Andreas Fault System. The principal faults of this system include the San Gregorio, San Andreas, Hayward–Rodgers Creek, Calaveras, Concord–Green Valley, and Greenville faults in addition to the Mt. Diablo thrust fault (USGS, 2003). The USGS estimates that there is a 62 percent probability of at least one earthquake of magnitude 6.7 or greater occurring within the Bay Area before 2031. While a magnitude 6.7 or greater earthquake would most likely occur on one of the seven principal faults, it could also occur on a different known fault or a previously unidentified fault.

The closest faults to the project site are the San Andreas and Hayward–Rodgers Creek faults, located 7 miles to the southwest and 12 miles to the northeast, respectively. The USGS estimates that the maximum earthquake on the Peninsula and North Coast segments of the San Andreas fault would have magnitudes of 7.1 and 7.4, respectively (Cao et al., 2003). The maximum earthquake on the northern and southern segments of the Hayward fault would have magnitudes of 6.4 and 6.7, respectively. The 1906 and 1989 (Loma Prieta) earthquakes on the San Andreas fault had magnitudes of 7.9 and 6.9, respectively.

REGULATORY FRAMEWORK

The Seismic Hazard Mapping Act was passed in 1990 following the Loma Prieta earthquake to reduce threats to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards, including liquefaction.³ Under this act, the California Geological Survey produced Seismic Hazard Zone Maps delineating areas of potential liquefaction and earthquake-induced landslides in much of the Bay Area, and has plans to produce additional maps for those areas not currently mapped. Cities, counties, and state agencies are directed to use the Seismic Hazard Zone Maps in their land use planning and permitting processes. Areas of potential liquefaction and earthquake-induced landslides are mapped on a

³ Liquefaction occurs when loose, saturated, cohesionless soil (such as sand) is subjected to a shock that causes an increase in pore water pressure. Potential consequences of liquefaction include the loss of bearing capacity, differential settlement, and lateral spreading; these effects can cause serious building foundation failures.

broad scale based on regional information, and the Seismic Hazards Mapping Act requires that site-specific geotechnical investigations and geotechnical reports be performed prior to permitting most urban development projects within the hazard zones.⁴ Evaluation and mitigation of identified seismic hazards must be conducted in accordance with guidelines established by the California State Mining and Geology Board (Department of Conservation, 1997).

The requirements of this act would apply to the proposed project because the project site is located within an identified zone of potential liquefaction, as indicated on Figure 12 (Department of Conservation, 2001). In addition, Maps 2 and 3 of the General Plan Community Safety Element indicate that the proposed project site is in an area that would be subject to moderate ground shaking due to an earthquake along the Peninsula segment of the San Andreas and northern Hayward faults, and Map 4 indicates that the proposed project is located in an area of liquefaction potential.

IMPACTS

SIGNIFICANCE CRITERIA

In accordance with the CEQA Guidelines, the San Francisco Planning Department generally considers that implementation of a proposed project would have a significant effect related to geology and seismicity if it were to:

- Expose people or property to major geologic hazards, such as earthquakes, landslides, mudslides, ground failure, or similar hazards; or
- Cause substantial flooding, erosion, or siltation.

IMPACTS

There are a number of potential geologic and seismic impacts related to construction and operation of the proposed project. The proposed project includes renovation of the former Degaussing Station adjacent to the Fair's Seawall, which could expose people to seismic hazards, including ground shaking and liquefaction. Construction of all three new breakwaters and removal and alteration of the existing moles in the West Harbor could affect current velocities and wave heights at the harbors, potentially affecting the Fair's Seawall, the Marina Boulevard Seawall, and the structural integrity of Pier 1 at Fort Mason. The breakwater structures could also affect local or regional sedimentation patterns. Vibrations from pile driving for the proposed floating breakwater at the East Harbor could affect Pier 1 and associated structures at Fort Mason. Installation of the floating breakwater could also interfere with construction activities planned at Pier 1.

⁴ In accordance with Title 14 of the California Code of Regulations, 3601(e), the act applies only to buildings that would be inhabited for more than 2,000 person-hours per year.

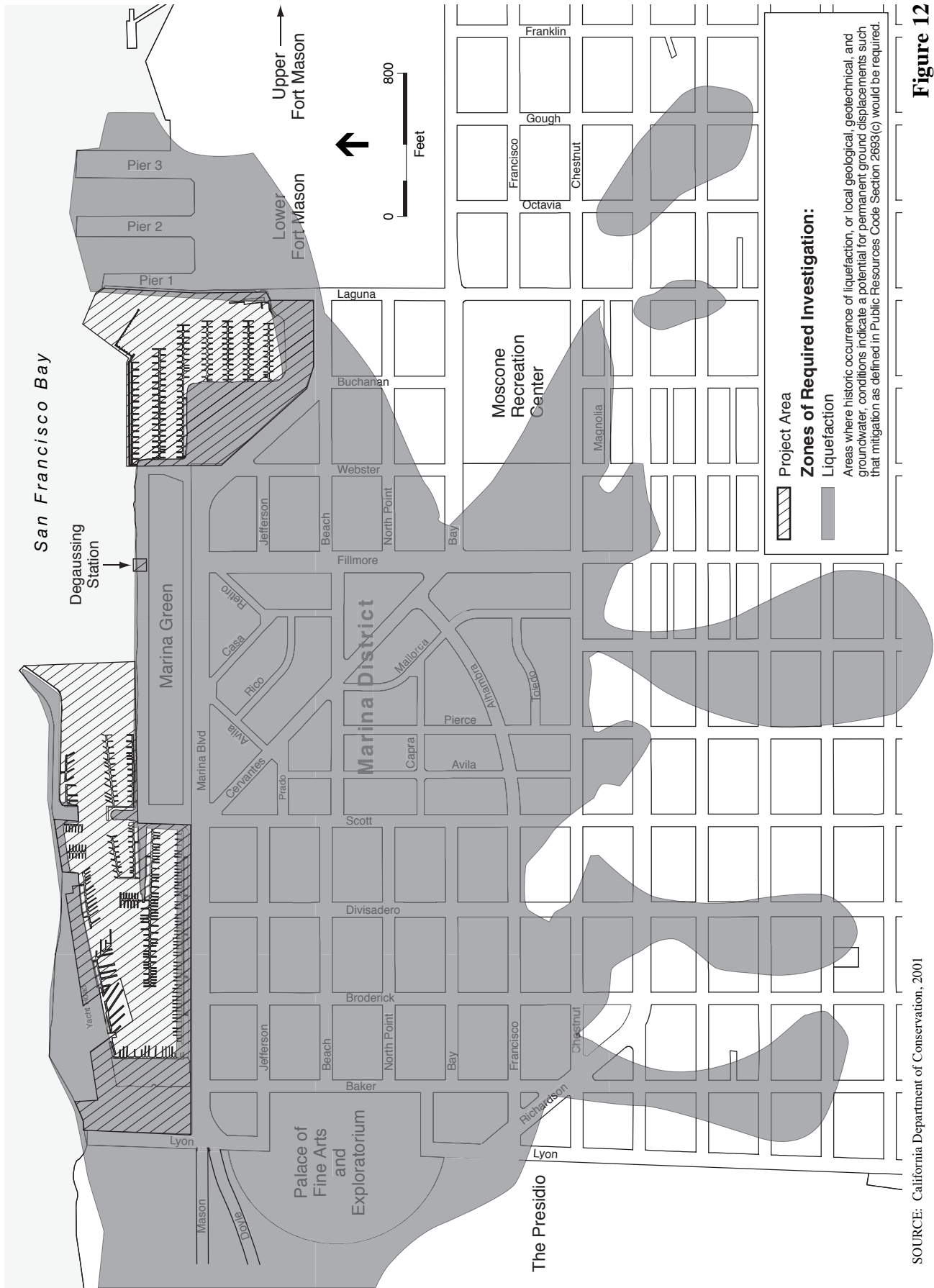


Figure 12
Seismic Hazard Zones

These potential impacts are discussed below, and mitigation measures are identified to reduce each impact to a less-than-significant level. The project would not involve substantial alteration of the Fair's Seawall or the Marina Boulevard Seawall; however, structural strengthening of the former Degaussing Station could be required to protect it from damage in the event of an earthquake on one of the regional faults.

Ground Shaking and Secondary Effects

As discussed in the Setting, the proposed project site is located in an area that would be subject to strong ground shaking and potential liquefaction in the event of a major earthquake on the San Andreas or Hayward fault. The Marina District suffered extensive structural damage as well as loss of life during the 1989 Loma Prieta earthquake, due largely to a high water table and unconsolidated sediments and fill materials in the vicinity. These conditions can amplify ground shaking and result in liquefaction and settlement, which can cause considerably more structural damage than would be experienced by a building placed on materials such as bedrock or more consolidated sediments.

The ground shaking that accompanied the 1989 earthquake resulted in liquefaction and settlement in the Marina District. During future earthquakes, the project site could experience a similar degree of ground shaking because the project site is underlain by geologic materials that have a relatively high susceptibility to ground failure due to liquefaction. Liquefaction could damage one of the Marina seawalls, inducing flow slides of liquefied material behind the seawalls. Two investigations were conducted on behalf of the City and County of San Francisco to evaluate the potential for liquefaction to occur within the Marina District and to predict the effects of liquefaction on the Fair's Seawall and the Marina Boulevard Seawall (Harding Lawson Associates et al., 1991; Treadwell and Rollo, 1997). The portions of these investigations relevant to the seawalls and St. Francis Spit are summarized below.

Fair's Seawall

A 1991 liquefaction study concluded that, in the event of a magnitude 7.9 earthquake (the magnitude of the 1906 earthquake), the Fair's Seawall would move 4 to 8 feet toward the Bay, and the Marina Green would experience settlement of up to 1 foot (Harding Lawson Associates et al., 1991). Major movement would be restricted to the area north of the Marina Boulevard box sewer (Figure 11). The study concluded that, based on the construction of the seawall, the wall could move laterally up to 7 feet without being breached.

The study also concluded that it would not be economically feasible to construct ground improvements to reduce liquefaction effects in large areas, and that ground improvements behind the Fair's Seawall would be required only if the goal were to reduce settlement in the entire Marina Green. Instead, ground improvements could be applied in strategic areas, such as near underground utilities, to reduce the effects of liquefaction at a given location.

Marina Boulevard Seawall

The 1991 liquefaction study concluded that, in the event of a magnitude 7.9 earthquake, the Marina Boulevard Seawall could move towards the West Harbor, and that the area behind the seawall could experience vertical settlement, although the amount of predicted movement was not stated (Harding Lawson Associates et al., 1991). The study concluded that widespread liquefaction would not occur behind the seawall because of medium-dense sands, but localized liquefaction of the fill could occur. The study recommended ground improvements between the seawall and the box sewer to the south to reduce the potential for ground settlement and lateral displacement and to reduce the potential for displacement of the box sewer.

A 1997 investigation concluded that submerged fill and hydraulic fill materials in the vicinity of the Marina Boulevard Seawall would be subject to liquefaction in the event of a major earthquake (Treadwell and Rollo, 1997). Gravel and rock fill and native sand in this area were considered to have a low potential for liquefaction, except in isolated, noncontinuous deposits of native sand. The investigation considered the effects of a magnitude 7.9 earthquake and a magnitude 7.0 earthquake on either the San Andreas or Hayward faults, concluding that substantial movement would not likely occur to the west of Divisadero Street, where soil below the water table consists primarily of medium-dense to dense natural sand instead of fill. However, the lateral movement of the seawall to the east of Divisadero Street would be about 3 feet and 6 inches, respectively, for these seismic events.

The 1997 investigation concluded that improvements to the Marina Boulevard Seawall and the ground between the seawall and the box sewer would not substantially reduce the amount of areawide lateral spreading that could occur in the vicinity of the Marina Boulevard Seawall. Based on the 1991 and 1997 investigations, it is not considered economically feasible to address the stability of this larger area.

As stated in the 1997 report, improvements to the Marina Boulevard Seawall could decrease the potential for failure of the seawall in the event of a major earthquake. However, even with improvements, the seawall could be damaged by areawide spreading during a magnitude 7.9 earthquake. The report states that the City could choose to do nothing at this time and to repair the seawall, utilities, and sidewalk/jogging path behind the seawall after an earthquake.

St. Francis Spit

The 1991 liquefaction study concluded that, in the event of 7.9 magnitude earthquake on the San Andreas fault, the St. Francis Spit could experience slope failure resulting in 5 feet or more of lateral displacement. The 1991 report recommended ground improvement to reduce the potential for ground movement at the spit. As the proposed project would not alter the spit, the project would have no effect on this existing seismic condition.

Harbor Office and Degaussing Station

The project would shift both office workers and visitors from the existing Harbor Office to the former Degaussing Station, which would be renovated into a new Harbor Office. Although public

exposure to seismic risks would not change substantially from those present under existing conditions, both the Harbor Office and the Degaussing Station are in a liquefaction zone (which could lead to differential settlement in a major earthquake) and are adjacent to and partially on top of the Fair's Seawall (which could be displaced in a major earthquake). The proposed renovations to the Harbor Office would not expose substantially more people to a seismic risk in this area than already exists, and the interior renovations would be relatively minor (Americans with Disabilities Act upgrades and a small increase in the size of the restrooms). The interior renovations to the Degaussing Station, however, would allow reoccupancy of a building that is currently vacant, potentially exposing people to seismic hazards in a structure not otherwise utilized.

The California Seismic Hazards Mapping Act (CSHMA) (Public Resources Code, Section 2690 et seq.) and the San Francisco Building Code (Code) require a geotechnical investigation and geotechnical report be prepared for new or renovated buildings constructed in liquefaction zones that would be inhabited for more than 2,000 person-hours per year,⁵ or for renovations that would exceed 50 percent of the floor area of the building, or more than 50 percent of the value of the building. Although the Degaussing Station would be inhabited for at least 2,000 person-hours per year by marina staff, it is unknown whether the renovations would exceed 50 percent of the size or value of the building, given that renovation plans have not been finalized. As renovations to the Harbor Office would be relatively minor and would not change or increase the occupancy of the building, the requirements for geological investigation under the CSHMA/Code would not likely apply to this building. However, because it is unknown whether the CSHMA/Code and their geotechnical requirements would apply to the renovations of the Degaussing Station, and because the building is in an area where liquefaction hazards are present, reoccupancy of this building under the proposed project could expose people who would otherwise not utilize this building to a seismic hazard. Without mitigation, this impact would be potentially significant.

To reduce the seismic risk to an acceptable level, a geotechnical investigation and geotechnical report would be prepared as part of the proposed renovations to the former Degaussing Station as specified in Mitigation Measure GEO-1 (see Chapter IV, Mitigation and Improvement Measures, p. IV-3), regardless of whether the CSHMA/Code would require them or not. The investigation would evaluate the potential for liquefaction to occur on or near the site and would identify measures to reduce seismic hazards to an acceptable level. Technically feasible measures may include a concrete mat foundation or a "grade beam" foundation system that could be incorporated into the building design, allowing the building to "float" without substantial structural damage in the event of earthquake-induced liquefaction (Kornfield, 2005), thereby reducing human exposure to seismic risks to acceptable levels. The final building plans would incorporate the recommendations of the geotechnical report, and the project sponsor would obtain review of the plans by the San Francisco Department of Building and Inspection (DBI) as a condition of project approval.

⁵ This building, like the existing Harbor Office, would be staffed for 9 hours a day, 365 days a year, by at least two marina employees, totaling 6,570 person-hours per year.

Although the proposed maintenance building would also be constructed in a liquefaction zone, a geotechnical investigation would not be required for this facility because the building would be used primarily for storage and would be inhabited substantially less than 2,000 person-hours per year.

Ground Shaking Effects on the Seawalls

The investigations discussed above indicate the potential for the seawalls to move and settle in the event of a major earthquake on the San Andreas or Hayward faults. This existing areawide risk would not be affected or worsened by the proposed project. The removal of the mole at the foot of Scott Street, however, would expose a portion of the Fair's Seawall to wave action. This exposure to wave action would not likely be sufficient to make the seawall more susceptible to failure or earthquake damage, and the mole would be removed in accordance with accepted engineering standards. However, because the design of the project has not been finalized, damage to the seawall could occur. Such potential damage to the seawall would be considered a significant impact. To reduce this potential impact, the newly exposed portion of the seawall would be inspected during construction, and toe protection similar to what exists along the remainder of the seawall would be installed, as specified in Mitigation Measure GEO-2 (see Chapter IV, Mitigation and Improvement Measures, p. IV-4). In accordance with this measure, the seawall would also be periodically inspected for structural defects in the vicinity of the mole removal, and any defects would be repaired promptly.

Although the new breakwater installed within the West Harbor would likely attach to the Fair's Seawall for a distance of 15 to 20 feet, the method of attachment would be determined during the design phase of the project and would follow accepted engineering practices. Therefore, the project would not affect the structural integrity of the seawall to withstand a major earthquake. Because the new breakwater would add a solid structure in front of the seawall, it could prevent the potential displacement of the seawall in this location after a major earthquake.

Effects of Proposed Breakwaters

The Breakwater Improvement Study (Moffat & Nichol, 2004), included in Appendix C, was conducted to evaluate: (1) the potential effects of proposed breakwater construction on sedimentation and erosion rates both on and off the site; (2) the attenuation of wave energy; (3) potential effects on the adjacent Fort Mason structures due to reflected wave energy; and (4) circulation within the harbors. This feasibility-level modeling, based on standard assumptions, familiarity with site-specific issues, and professional judgment, provides an estimate of the maximum potential effects of the project. Typical daily operations as well as storm events were considered as part of the evaluation. The assumptions and conclusions of the study were peer-reviewed for accuracy by an independent engineering firm (Coast & Harbor Engineering, 2004); the report is available for review at the Planning Department. The findings of the Breakwater Improvement Study are discussed below.

As final designs of the breakwaters have not been determined, it is possible that the breakwaters might not perform as intended, thus resulting in potentially significant onsite and offsite impacts

if preconstruction quantitative modeling of the breakwater designs were not conducted. However, as specified in Mitigation Measure GEO-3 (see Chapter IV, Mitigation and Improvement Measures, p. IV-4), preconstruction quantitative modeling would be conducted on the final breakwater designs to ensure that the breakwater structures would perform as intended. This quantitative analysis, to be conducted during the design phase of the project using the actual dimensions of the structures, could include collection of field data; structural and geotechnical engineering; physical and/or numerical modeling; and physical or chemical sediment characterization. Monitoring (including visual monitoring for evidence of cracks, scour,⁶ or other forms of damage) would be required to measure the potential effects of the project. Identified structural defects would be repaired promptly. Implementation of this measure would ensure that potential geological and seismological impacts associated with installation of the proposed breakwaters would be less than significant.

Wave Action on the Seawalls

As discussed above, the seawalls could be damaged in the event of a major earthquake on one of the regional faults. The project would have a significant impact if it would substantially change current velocity or wave propagation patterns such that the seawalls were damaged or made more susceptible to failure or earthquake damage. However, wave modeling studies prepared for this project indicate that current velocities and wave energy would generally decrease in the vicinity of the seawalls due to the proposed breakwaters, making them less susceptible to damage from wave action (Moffatt & Nichol, 2004). Therefore, the project would not have an adverse impact because it would generally decrease wave energy directed at the seawalls. These effects are described in detail below.

Changes in Current Velocity. Computer modeling indicates that the proposed breakwaters would result in an increase in current velocity of up to 0.1 meter per second at both harbor entrances and up to 0.05 meter per second in a localized area near the Fair's Seawall within the inner basin of the West Harbor. The current velocity would not change at the eastern point of the outer jetty. A decrease in current velocities of up to 0.05 meter per second is predicted outside of the East Harbor. Velocity changes of up to 0.05 meter per second, such as those predicted near the Fair's Seawall and outside of the East Harbor, are considered to be within the model's margin of error and would not be likely to cause any damage to the seawalls. Therefore, no significant impacts associated with current velocity are expected.

Changes in Wave Height. Computer modeling performed for the Breakwater Improvement Study also evaluated the effectiveness of the proposed breakwater structures in attenuating wave energy from northwest waves originating from the Golden Gate as well as locally generated northeast wind-waves. The directions and peak periods that produced the most wave energy (representative of storm conditions) were selected for analysis. For waves through the Golden Gate, the maximum energy was associated with a wave from the northwest (285 degrees azimuth) and a peak wave period of 10 seconds. For locally generated wind-waves, the maximum energy

⁶ Scour is a natural phenomenon, caused by local increases in water velocity together with eddies and vortices, which can increase the amount of suspended sediment in the water and cause damage to the adjacent structure.

was associated with a 3.5-foot wave from the northeast (45 degrees azimuth) and a peak wave period of 4 seconds.

West Harbor. Construction of the proposed breakwaters in the West Harbor would reduce the height of the northeast wind-wave by up to 50 percent along the Fair's Seawall and 10 percent within the inner harbor, with no change in wave height adjacent to the Marina Boulevard Seawall. The height of the northeast wind-wave would be increased by up to 10 percent along the north side of the outer jetty, including the eastern tip, and along the Fair's Seawall east of the proposed breakwaters. A 10 percent change in wave height is equal to approximately 2.5 inches, which is considered within the accuracy of the model. This relatively small change in wave height would not have a significant impact on the structural integrity of either the outer jetty or the seawalls.

Removal of the mole at the foot of Scott Street would expose a portion of the Fair's Seawall to wave action. According to the engineering report, both the northeast and northwest wind-wave heights could slightly increase at the location where the mole would be removed. Although the exposure to wave action would not likely be sufficient to make the seawall more susceptible to failure or earthquake damage, damage could occur as the project design has not been finalized, which would be a significant impact. Mitigation Measure GEO-2 requires that the newly exposed portion of the seawall be inspected during construction, toe protection similar to what exists along the rest of the seawall be installed, periodic inspection be conducted for structural defects in the vicinity of the mole removal, and any identified defects be repaired promptly. Implementation of Measure GEO-2 would reduce potential impacts to the seawall from wave action to a less-than-significant level.

East Harbor. The East Harbor is exposed to northeast wind-waves, with up to 100 percent of the original wave height entering parts of the harbor. With construction of the floating breakwater, northeast wind-waves would be reduced by up to 50 percent. Very little wave energy from northwest waves would enter the marina. The longer-period swells of the northwest wave would be expected to pass unaffected under the floating breakwater. Although it would be possible to attain more wave protection in the East Harbor with a solid breakwater design, such a design would have the undesirable effect of causing greater reflection of wave energy towards Fort Mason's Pier 1, as discussed below.

Wave Effects on Fort Mason Structures. The proposed project would have a significant impact if it caused changes in wave propagation patterns that could damage Pier 1's structures, making them more susceptible to failure or damage in the event of a major earthquake. Numerical modeling has demonstrated that, while construction of the floating breakwater at the East Harbor would increase wave forces on this structure due to reflected waves, these forces would be well within the limits that the existing structure can withstand. These effects are further described below.

The East Harbor is subjected to local wind-generated waves as well as waves that originate from ocean swells. As is typical for floating breakwater structures, long-period ocean swells would propagate directly through the proposed floating breakwater at the East Harbor, and little wave

reflection or dissipation would occur. Some of the wave energy from local wind-waves would be reflected or dissipated by the floating breakwater, which could increase wave energy directed toward Fort Mason's Pier 1, potentially damaging or weakening this structure.

The percentage of transmitted, reflected, and dissipated wave energy caused by a breakwater structure is dependent on local water depth, incident wave characteristics, and breakwater-type design parameters. The Breakwater Improvement Study concluded that a floating breakwater design would minimize the amount of wave energy reflected towards the Fort Mason structures, although it would not be as effective as other designs in reducing wave energy within the East Harbor. Other designs considered but rejected included a rubble-fill breakwater, which would require a very large footprint, and a sheetpile breakwater, which could amplify the waves at Pier 1 and increase the potential for scour at the base of Pier 1's pilings. As such, a floating breakwater was selected as the preferred project design and was modeled for its wave attenuation effects accordingly.

Assuming a maximum water depth of -25 feet mean lower low water, an incident wave height of 3.5 feet, and a peak wave period of 4 seconds resulting from a northeast wind, the Breakwater Improvement Study concluded that, under existing conditions, a typical pile at Pier 1 experiences a wind-wave load of 2.5 kips⁷ and a corresponding force at the mudline⁸ of 44.5 kip-feet.⁹ To evaluate the effects of the floating breakwater, the Breakwater Improvement Study modeled a floating breakwater that would result in a minimum 50 percent reduction of the design wave for waves from the northeast, and no more than a 20 percent increase in design wave height at the Pier 1 piles due to reflection of northeast waves off the floating structure. Using these performance criteria, the maximum resulting wave load on a pile at Pier 1 would be 2.7 kips (an increase of 0.2 kips, or 8 percent). The corresponding force at the mudline would be 49.5 kip-feet (an increase of 5.0 kip-feet, or 11 percent). This calculation represents a conservative estimate of the potential forces on Pier 1, because the evaluation did not take into account the effects that the piles beneath Fort Mason's Piers 1 and 2 typically have on reducing wave heights from this direction before reaching the East Harbor.

According to the Breakwater Improvement Study, a 1999 structural evaluation of Pier 1 stated that the maximum allowable bending force for the 4-foot-diameter pile was 230 kip-feet, which factored in the structural deterioration of the pier over time. With construction of the floating breakwater, the maximum expected force at the mudline on Pier 1 would be 49.5 kip-feet, well below the maximum allowable bending capacity of this structure. In addition, the study concluded that the floating breakwater would not alter the water depths or substantially increase scour at the Pier 1 structures. On the basis of this analysis, construction of the floating breakwater at the East Harbor would not be expected to cause structural damage to Pier 1, even in its deteriorated condition. The proposed floating breakwater would be designed according to the performance criteria stated above (50 percent reduction of the height of the northeast wave in the

⁷ A "kip" is a unit of force equal to 1,000 pounds.

⁸ The mudline is the location where a piling meets the sea floor.

⁹ A "kip-foot" is a unit of force equal to 1,000 foot-pounds.

East Harbor, and reflected wave heights onto Pier 1 that are no more than a 20 percent increase in design wave height); therefore, impacts related to potential damage to Fort Mason structures due to wave reflection from the floating breakwater at the East Harbor would be less than significant.

Pile-Driving-Induced Vibration and Liquefaction

Piles for the proposed floating breakwater at the East Harbor would rest on dense silty sand and old bay mud, and installation of the piles through the overlying bay mud would not be expected to require driving (Moffatt & Nichol, 2004). Therefore, it is not likely that vibrations resulting from pile installation would damage the Fort Mason structures or induce liquefaction of the surrounding soil. Repairs to Piers 1 and 2 at Fort Mason have included pile driving through the deck of the piers, very close to existing structures, without any effects on these structures. However, given the structural condition of Pier 1, vibration from pile driving (if this construction method is used to install the East Harbor breakwater) could further weaken this structure, which would be a significant impact. To mitigate this potential impact, the project sponsor would implement Mitigation Measure GEO-4 (see Chapter IV, Mitigation and Improvement Measures, p. IV-4), which would require a geotechnical investigation in the area where the piles for the East Harbor breakwater would be installed, and a pile design analysis to further evaluate the potential pile types and the effects of pile driving. The analysis would be performed to determine if an alternative pile type (such as an open steel pipe instead of concrete) or installation method (such as predrilling, water-jetting, or using resonance-free vibratory hammers) would minimize vibration and/or liquefaction hazards. If warranted by the analysis, a test pile program would be conducted to measure underwater vibration as well as piling deflections. If alternative pile types or installation methods would not be effective in minimizing vibration and/or liquefaction hazards, the project sponsor would conduct vibration monitoring of Pier 1 and associated structures. If construction vibration exceeds an acceptable structural threshold, pile-driving activities would cease until an alternative plan could be devised. If no additional alternative pile type or installation methods exist (beyond those discussed above) to reduce the vibration from pile driving to an acceptable level, the breakwater in the East Harbor would be constructed after structural improvements to Pier 1 have been completed. Implementation of Mitigation Measure GEO-4 would reduce vibration-related impacts to Pier 1 to a less-than-significant level.

Offsite Sedimentation and Erosion

Sedimentation and erosion are natural processes, but are considered hazards and can cause property damage if they occur unimpeded over an extended period. The proposed project would include two new breakwaters in the West Harbor and one new floating breakwater in the East Harbor to reduce the effects of wave action on the seawalls and marina structures. Without proper placement and design, however, construction of these breakwaters could increase erosion on or off the site.

The Breakwater Improvement Study evaluated whether the project could alter sedimentation and coastal erosion patterns at offsite locations such as Crissy Field. Numerical modeling performed to evaluate sediment transport patterns predicted that potential effects on sedimentation and erosion rates would be limited to the immediate vicinity of the new breakwaters and would not

affect offsite locations, including the area “up-coast” of the marina between the Golden Gate and the West Harbor, including Crissy Field. Because of their alignment and location, the proposed breakwater segments would not interrupt the east-west movement of sand during northeast storms, and therefore would not contribute to additional sand transport in either a west or an east direction. Therefore, impacts related to offsite sedimentation and erosion would be less than significant.

CUMULATIVE IMPACTS

The proposed project could result in cumulative impacts if construction of the proposed breakwater in the East Harbor would restrict or impede access required to make planned seismic repairs to Pier 1 at Fort Mason. An East Harbor breakwater could impede access to Pier 1 because the breakwater would be about 10 to 20 feet from the pier, making it difficult to use larger pile-driving or other construction equipment. This cumulative impact would be potentially significant. As currently proposed, the floating breakwater would use a guide-pile system, with pilings spaced a minimum of 20 feet apart, and could be disconnected from these piles relatively easily. If this design is implemented, construction access to Pier 1 would not be impeded to the extent that these repairs could not occur. Additionally, removal of the floating breakwater during construction activities would reduce any wave reflection effects the breakwater would have on construction equipment used for the Pier 1 repairs. However, because the design of the floating breakwater has not been completed, it is unknown whether these access features would be incorporated into the final design. To mitigate this potentially significant impact, the project sponsor would ensure that the breakwater design incorporates a guide-pile system that would allow the float to be disconnected from the piles, and would work with the National Park Service regarding construction schedules to ensure that improvements to the Fort Mason structures are coordinated with installation of the floating breakwater, as recommended in the Breakwater Improvement Study and specified in Mitigation Measure GEO-5 (see Chapter IV, Mitigation and Improvement Measures, p. IV-5). Implementation of this measure would reduce potential impacts at Pier 1 to a less-than-significant level.

There are no known projects in the immediate vicinity that, in combination with the proposed project, could result in a significant cumulative impact in terms of coastal erosion or ground shaking and associated secondary effects. The planned seismic strengthening of Pier 1 at Fort Mason would have a beneficial effect, reducing the risk of seismic hazards in the area. Coastal erosion, if any, stemming from the Pier 1 renovations would likely be minimal, as the project would replace existing piles rather than installing new in-water structures. Impacts associated with coastal erosion would be evaluated prior to construction of improvements to Pier 1, and the project would be required to mitigate any significant impacts to a less-than-significant level. As a result, no cumulative effects are expected.

E. HYDROLOGY AND WATER QUALITY

The Water Quality section of the Initial Study (see Appendix A) concluded that the proposed project could result in significant impacts to water quality related to the dredging and disposal of East Harbor sediments that contain elevated levels of contaminants. This topic is therefore discussed in the EIR. The Initial Study concluded that potential water quality impacts related to design and operation of the marina, construction and maintenance dredging of the West Harbor, and construction activities in both harbors would be less than significant. Therefore, these topics are not discussed in the EIR.

SETTING

EXISTING PHYSICAL CONDITIONS

Water quality in San Francisco Bay in the vicinity of the marina is affected by a number of physical factors, including tides, currents, water depth (bathymetry), circulation and flushing, and sediment quality. These factors and their relationship to the project are discussed below.

Tidal Fluctuations and Currents

There are two daily tidal cycles in San Francisco Bay: two ebb tides (outgoing or falling tides) associated with two flood tides (incoming or rising tides) each day. These tidal cycles correspond with two high and two low water levels of varying heights, depending on the intensity of the tide, winds, and barometric conditions. The average tide range is 6 feet. Tidal currents in the Bay occur primarily as a result of the changing tides, and these currents cause a flushing action that leads to an exchange of Bay water.

Bathymetry

The East Harbor includes the entrance channel (the area along the Fort Mason structures between the harbor entrance and the fueling facilities) and the harbor itself (location of the boat docks and slips). The harbor is further divided into two areas: the inner and outer harbor. The area of the harbor closest to the shore and the fueling facility is referred to as the inner harbor, and the area to the north is referred to as the outer harbor. In 2000, the average depth of the East Harbor entrance channel ranged from -5 feet mean lower low water (MLLW) to -10 feet MLLW, and the depth of the harbor ranged from -2 feet MLLW to -7 feet MLLW (Arthur D. Little, 2000).

Sediment Quality

The following discussion presents the results of investigations that have been conducted to evaluate sediment quality in the East Harbor. The investigations included analysis of sediment samples representative of the material that would be dredged as well as of the material that would remain in place after dredging has been completed. Sampling of the sediments that would be dredged is necessary to determine the appropriate disposal method for the sediments. In general,

the sediments with the lowest chemical concentrations and toxicity are acceptable for in-Bay disposal. Sediments with higher chemical concentrations or toxicity could require disposal at an upland facility, as described under Disposal of Dredged Materials, below. The maximum concentrations of constituents identified in the sediments to be dredged are presented in Section III.F, Hazardous Materials and Waste, along with applicable disposal criteria.

The East Harbor sediments were sampled on five occasions between 1994 and 2000 for dredge disposal characterization. Composited sediment samples were obtained from the inner harbor in 1994 and from the location of a planned gangway to accommodate disabled persons in 1998 (ABT, 1994; ABT, 1998a). The sediment samples obtained during these sampling events contained polynuclear aromatic hydrocarbons (PAHs), pesticides, phthalates, sulfides, organic carbon, total recoverable petroleum hydrocarbons (TRPH),¹ and nitrogen. The metals arsenic, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, and zinc were each identified in at least one sediment sample, and soluble metals² were detected in sediment samples collected from the location of the planned gangway (see Section III.F, Hazardous Materials and Waste, for further discussion of the metals results). Polychlorinated biphenyls (PCBs), tributyltin, dibutyltin, monobutyltin, and dissolved sulfides were not detected in any of the sediment samples.

The results of this sediment sampling indicated that some of the East Harbor sediments would not be acceptable for in-Bay disposal due to the presence of PAHs at concentrations greater than 5 milligrams per kilograms (mg/kg). However, concentrations of metals and pesticides, as well as the toxicity of the sediments, would be acceptable for in-Bay disposal (see Regulatory Framework, below, for a description of sediment disposal regulations). Therefore, subsequent investigations, in 1995, 1997, 1998, and 2000, focused on assessing the distribution of PAHs in the sediments to be dredged for the proposed project (ABT, 1995; ABT 1998b; and Arthur D. Little, 2000).

Sampling conducted prior to 2000 included analysis of composited sediment, samples which did not allow for accurate calculations of the volume of sediments requiring upland disposal. Sediment sampling conducted in 2000 included analysis of discrete samples at 1-foot intervals to provide data regarding the extent of total petroleum hydrocarbons and total PAHs present at concentrations greater than 5 mg/kg (Arthur D. Little, 2000). These data were then used to evaluate the volume of sediments that would require upland disposal and the volume that would be suitable for in-Bay disposal. Based on this sampling and the required dredging depths of -7 feet MLLW in the harbor and -11 feet MLLW in the channel, approximately 17,500 cubic yards of sediment containing PAH concentrations greater than 5 mg/kg would require upland

¹ “Total recoverable petroleum hydrocarbons” is a measure of the total petroleum hydrocarbons in a sample measured by infrared and does not distinguish between the types of hydrocarbons present (such as gasoline or diesel). Unless a cleanup procedure is applied, naturally occurring organic material may also be identified by this method, resulting in an artificially high concentration detected in a sample.

² Soluble metals were determined in accordance with methods specified in state regulations for the classification of hazardous wastes (California Code of Regulations, Title 22, Chapter 11, Appendix II). However, deionized water was used for the extraction in place of the required citrate buffer. The soluble metals results, therefore, represent the concentrations of metals that may be soluble under neutral pH conditions, which is useful for evaluating upland disposal options, but cannot be used for waste classification purposes.

disposal, while 76,000 cubic yards of sediment would be suitable for in-Bay disposal, assuming a 2-foot overdredge (i.e., dredging 2 feet deeper than the required operational depth to allow placement of a cap over the sediments remaining in place). The maximum total PAH concentration identified in a sample of sediment that would be dredged for the project is 2,961 mg/kg. As discussed below under Water Quality Impacts Related to Construction Dredging, dredging of additional sediments could be required in accordance with additional regulatory requirements identified during the permitting process.

Sediments within the East Harbor were analyzed in 1995 for trace elements and organics, including pesticides and PAHs, as part of the State Water Resources Control Board (SWRCB) Bay Protection and Toxic Cleanup Program (discussed under Regulatory Framework, below). Total dichloro-diphenyl-trichloroethane (DDT) was identified at 0.004 mg/kg, and the pesticides dieldrin, beta-hexachlorocyclohexane (beta-HCH), and methoxychlor were detected in the sediment at a maximum concentration of 0.0065 mg/kg (SWRCB, 2000). PAHs were detected at a total concentration of 4.1 mg/kg. The trace elements aluminum, arsenic, cadmium, chromium, copper, lead, manganese, mercury, nickel, selenium, silver, and zinc were all detected in the sediment sample.

Ambient Water Quality

Ambient offshore water quality is not regularly monitored in the immediate vicinity of the project area. However, in 1993, the San Francisco Bay Regional Water Quality Control Board (RWQCB) initiated the Regional Monitoring Program as part of the Bay Protection and Toxic Cleanup Program for the San Francisco estuary, which includes the proposed project site. The general purposes of the program are to assess regional water quality conditions, characterize patterns and trends of contaminant concentrations and distribution in the water column, and identify general sources of contamination to the Bay. The program has established a database of water quality and sediment quality in the estuary, particularly with regard to toxic and potentially toxic trace elements and organic contaminants. The most recent water quality data for the Central Bay,³ the monitoring locations closest to the project area, were collected in 2002 (San Francisco Estuary Institute, 2002). These data indicate that, with the exception of PCBs, water quality conditions remain well within water quality objectives established by the RWQCB for the parameters monitored. These parameters include conventional water quality parameters (ammonia, conductivity, dissolved oxygen, dissolved organic carbon, silicates, hardness, nitrate, nitrite, pH, phosphate, salinity, temperature, suspended solids, phaeophytin, and chlorophyll); trace elements (aluminum, arsenic, cadmium, cobalt, copper, iron, lead, manganese, mercury, methylmercury, nickel, selenium, silver, and zinc); trace organics (including PAHs, PCBs, phthalates, polybrominated diphenyl ethers, and pesticides); and toxicity.

³ In previous years, the Regional Monitoring Program included collection of samples from specific sampling locations; the closest station monitored was Yerba Buena Island. In 2002, the program adopted a stratified-random sampling design that included collection of samples from random locations within five specific hydrographic regions of the Bay. The data discussed in this section are for samples collected from four randomly selected locations with the Central Bay hydrographic region, which is adjacent to the project area.

REGULATORY FRAMEWORK

Water Quality

The federal Clean Water Act of 1972 requires the U.S. Environmental Protection Agency (U.S. EPA) to develop, publish, and periodically update ambient water quality criteria for the protection of human health. In 1980, the U.S. EPA published water quality criteria for 64 pollutants and pollutant classes and considered noncancer, cancer, and taste and odor effects. Additional criteria were adopted under the 1992 National Toxics Rule (U.S. EPA, 2000). In 2002, the U.S. EPA revised its recommended water quality criteria for 83 chemicals based on a revised methodology adopted in 2000; additional revisions are planned. These criteria are used by states to establish water quality standards under Section 303(c) of the Clean Water Act and ultimately to provide a basis for controlling discharges or releases of pollutants.

The Porter-Cologne Water Quality Control Act (Division 7 of the California Water Code) regulates water quality within California and established the authority of the SWRCB and the nine regional boards. San Francisco Bay waters are under the jurisdiction of the San Francisco Bay RWQCB, which established regulatory standards and objectives for water quality in the Bay in the *Water Quality Control Plan for the San Francisco Bay Basin*, commonly referred to as the “Basin Plan” (RWQCB, 1995). The Basin Plan identifies existing and potential beneficial uses and provides numerical and narrative water quality objectives designed to protect those uses.

The following beneficial uses are identified for the central portion of San Francisco Bay, which includes the project site: commercial and sport fishing, estuarine habitat, industrial service supply, industrial process supply, fish migration, navigation, preservation of rare and endangered species, water contact recreation, noncontact water recreation, shellfish harvesting, fish spawning, and wildlife habitat.

The RWQCB has listed the central portion of San Francisco Bay as an *impaired water body*. Under Section 303(d) of the Clean Water Act, impaired waters are defined as those that do not meet water quality standards, even after point sources of pollution have implemented pollution control technology. The pollutants that have been identified as causing impairment in the central portion of the Bay include chlordane, DDT, diazinon, dieldrin, dioxin compounds, furan compounds, mercury, PAHs, PCBs, and selenium (RWQCB, 2003).

Bay Protection and Toxic Cleanup Program

In 1989, the California legislature established the Bay Protection and Toxic Cleanup Program, as specified in the California Water Code, Division 7, Chapter 5.6, with the four following goals:

- Protect present and future beneficial uses of the Bay and estuarine waters of California

- Identify and characterize toxic hot spots⁴
- Plan for toxic hot-spot cleanup and other remedial actions
- Develop prevention and control strategies for toxic pollutants that will prevent creation of new toxic hot spots or the perpetuation of existing ones within the state's bays and estuaries

As part of this program, the San Francisco Bay RWQCB completed a Pilot Regional Monitoring Program as a precursor to the current Regional Monitoring Program; continued participation in the monitoring program; completed a fish tissue study that identified contaminant concentrations sufficient to trigger a health advisory on consumption of Bay fish; and completed baywide sediment assessments to identify toxic hot spots. Through the cleanup program, 10 candidate toxic hot spots⁵ and nine sites of concern⁶ were identified in San Francisco Bay (SWRCB, 1999); no known toxic hot spots⁷ were identified. The RWQCB may require cleanup of a toxic hot spot by using its enforcement authorities or by revising the waste discharge requirements for permitted sites that contribute to a toxic hot spot. However, the RWQCB encourages potential dischargers to address known toxic hot spots through voluntary implementation of corrective actions. The East Harbor was identified as a site of concern based on the concentration of PAHs detected in the sediment, but the harbor has not been identified as a candidate or known toxic hot spot.

Excavation and Fill of Navigable Waters

The U.S. Army Corps of Engineers (ACOE) and U.S. EPA have jurisdiction over fill, dredging, and disposal of dredged materials under Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act, and the City would be required to obtain a permit from the ACOE to conduct any of these activities within the project area. Section 401 of the Clean Water Act requires the SWRCB and the RWQCBs to grant water quality certification for dredging activities. In accordance with Section 401 of the Clean Water Act, the state agencies may waive, certify, or deny any proposed activity requiring a federal permit. To waive or certify an activity, the state agencies must find that the proposed discharge would comply with state water quality standards. If the state agencies deny the proposed activity, the federal permit cannot be issued. In addition, the City would be required to obtain a permit from the San Francisco Bay Conservation and Development Commission (BCDC) for any activities involving the extraction of material or fill or a substantial change in the use of water, land, or structures in the Bay and within 100 feet inland of the Bay shoreline, including dredging activities. Currently, dredging permits from all of

⁴ A "hot spot" is a localized area where elevated concentrations of pollutants are found in association with adverse biological impacts.

⁵ A candidate hot spot is one where the site exceeds water or sediment quality objectives; the water or sediment exhibits toxicity associated with pollutants; the tissue toxic pollutant levels of organisms collected from the site exceed levels established by the Food and Drug Administration or National Academy of Sciences; resident individuals are impaired; or there is significant degradation in biological populations and/or communities.

⁶ A site of concern is one that showed indications of toxicity or other related problems, but where insufficient evidence was available to rank it as a candidate toxic hot spot. Sites of concern are listed for consideration as targets of future monitoring or analysis efforts.

⁷ A known toxic hot spot is a site that meets one of the criteria for a candidate toxic hot spot and has gone through a full SWRCB and RWQCB hearing process.

these agencies are handled jointly through the Dredged Material Management Office (DMMO), which also includes the State Lands Commission, U.S. EPA, California Department of Fish and Game (CDFG), National Oceanic and Atmospheric Administration (NOAA) Fisheries, and U.S. Fish and Wildlife Service as member agencies.

Existing Maintenance Dredging Permit

As described in the Water Quality section of the Initial Study prepared for this project (see Appendix A), the West Harbor of the marina requires periodic maintenance dredging, which is covered under an existing dredging permit from the ACOE (ACOE, 2000). The current permit was issued in 2000 and authorizes dredging of 175,000 cubic yards of sediment from the West Harbor and 350,000 to 600,000 cubic yards of sand material from the outer jetty and entrance channel for a 10-year period (through December 31, 2009). Removal of sand material from the outer jetty and entrance channel is intended to reduce dredging requirements in the West Harbor and is referred to as sand mining. Construction dredging and maintenance dredging of the West Harbor for the proposed project would be covered by this permit, but dredging of the East Harbor would not. Although the existing permit does not authorize dredging from the East Harbor, it is likely that, at a minimum, the permit that would be issued for the East Harbor dredging would have similar requirements.

Prior to any dredging, the City's existing dredging permit requires sampling of sediments to be dredged and testing for agency approval of in-Bay disposal. For each dredging episode, the City is also required to obtain a letter of water quality certification from the RWQCB and authorization from the BCDC. In addition to notifying the ACOE, RWQCB, and BCDC, the City must submit results of the sediment testing to the U.S. EPA, U.S. Fish and Wildlife Service, NOAA Fisheries, and the CDFG through the DMMO review process. The permit specifies the following restrictions on dredging and sand mining activities:

- All dredging activities are required to occur outside of the Pacific herring spawning season, December 1 through March 1, or as determined by the CDFG.
- Between June 1 and November 30, the City will make every effort to avoid sand mining from the outer jetty and entrance channel on weekends without approval by the CDFG.
- Between August 15 and October 15, the City must limit sand mining from the outer jetty and entrance channel to three barge loads per week, with one occurring on the weekends. Additional barge loads must be approved by the CDFG, and sand mining activities can be suspended by the CDFG if the department becomes aware of sufficient effects on the California halibut and its sport and commercial fisheries.
- No sand mining from the outer jetty and entrance channel is allowed between December 1 and May 31 for the protection of Chinook salmon and steelhead.

For dredging in the East Harbor, the ACOE may impose more stringent requirements than those listed above because of the presence of contaminated sediments.

Disposal of Dredged Materials

The RWQCB and U.S. EPA are responsible for determining appropriate dredged material testing and discharge standards, and for assuring that dredging and the disposal of dredged materials are consistent with the maintenance of Bay water quality. In 1998, the ACOE and U.S. EPA published national guidance for the evaluation of materials to be disposed of in “waters of the United States.” This document, *Evaluation of Dredged Material Proposed for Discharge in Waters of the U.S. – Testing Manual*, is referred to as the Inland Testing Manual (U.S. EPA, 1992). The manual uses a tiered and effects-based approach to sampling designed to ensure that adequate information is generated to satisfy the requirements of the guidance for disposal at in-Bay sites, without making permit applicants test unnecessarily.

The DMMO agencies have published guidance on testing under the Inland Testing Manual in Public Notice (PN) 01-01 (DMMO, 2001). This guidance document replaces previous DMMO guidance provided in PN 99-3 and may be upgraded or replaced when the DMMO agencies develop a regional implementation manual, which will incorporate existing local guidance for testing requirements for all disposal environments in the planning area.

Dredged materials that are not suitable for unconfined aquatic disposal and are not classified as a hazardous waste may be disposed of at an upland facility or put to upland beneficial reuse, including (among many possible uses) wetlands creation, habitat restoration, levee restoration, construction fill, or daily landfill cover. Criteria for determining the appropriate disposal method are described in Section III.F, Hazardous Materials and Waste. As described in that section, material that is not considered a hazardous waste, but is within the acceptance criteria for upland beneficial reuse, can generally be disposed of in a permitted upland facility, although individual facilities may have site-specific acceptance criteria. Material that exceeds the criteria for beneficial reuse or for specific upland disposal sites would require disposal at a legally permitted Class II or III disposal facility; material that is classified as a hazardous waste would require disposal as a hazardous waste. Final determination of a suitable disposal method is specified in the permit issued for the dredging project.

Upland facilities permitted for dredged material disposal are required to obtain waste discharge permits from the RWQCB to ensure that disposal of the dredged material will result in minimal risks to the environment. Permit requirements typically include design constraints, monitoring requirements, discharge prohibitions, effluent limitations, and receiving water limitations. There are six multi-user upland/wetland/reuse sites in the Bay Area that accept dredged sediments from a variety of projects. These sites include Carneros River Ranch, Winter Island, Montezuma Wetlands, Van Sickle Island, Port Sonoma, and the eastern portion of the San Francisco Bar Channel Site. Each of these sites has individual acceptance criteria for dredged sediments, depending on permit requirements.

Regulatory Authorities and Required Permits

Federal, state, and local water quality regulations, permits, and policies associated with dredging in the East Harbor that may apply to the project are summarized in Table 3.

**TABLE 3
SUMMARY OF REGULATORY AUTHORITIES AND JURISDICTIONS AND
LIKELY PERMIT REQUIREMENTS RELATING TO WATER QUALITY**

Agency – Permit/Action	Statutory Authority and Jurisdictional Scope	Project Activity for which Permit/Action May Be Required
U.S. Army Corps of Engineers – Section 404 permit for disposal of dredged materials in waters of the United States	Section 404 of the Clean Water Act – Section 404 regulates the disposal of dredged or fill material into waters of the United States.	Disposal of dredged materials to waters of the United States, including disposal of dredged materials from the East Harbor.
U.S. Army Corps of Engineers – Section 10 permit for fill in waters of the United States	Section 10 of the Rivers and Harbors Act – The ACOE regulates activities in navigable waters of the United States, subject to the ebb and flow of the tide (up to mean high water), and/or waters that have historically been used, are currently used, or may be used in the future for interstate or foreign commerce.	Any activity in navigable waters involving discharge of dredged or fill material, which could include breakwater construction and dredging of the East Harbor.
California Department of Fish and Game	California Endangered Species Act – Affords protection to state-listed threatened and endangered species. While CDFG has no direct permitting authority over project activities, the agency will review all environmental documentation for the project.	Any activity that could adversely affect state-listed threatened or endangered species, which could include breakwater construction and dredging.
Bay Conservation and Development Commission – Permit	McAteer-Petris Act of 1965 and the San Francisco Bay Plan – BCDC has jurisdiction over tidal areas of San Francisco Bay and a shoreline band extending 100 feet inland of the mean high tide line. Any fill, excavation of material, or substantial change in use within BCDC jurisdiction requires a permit from BCDC. In conjunction with the RWQCB, BCDC enforces management measures to reduce or prevent nonpoint-source pollution as part of the special permit requirements that would be made part of the permit.	Placement of fill in Bay waters and dredging, which could include new berths, breakwater construction, and dredging of the East Harbor.
San Francisco Bay Regional Water Quality Control Board – Water Quality Certification	Section 401 of the Clean Water Act – Section 401 requires an RWQCB certification for any discharge of dredged or fill material into waters of the United States, certifying that the discharge is consistent with the state’s water quality standards and criteria. A request for certification is submitted to the RWQCB at the same time that a Section 10 application is filed with the ACOE.	Any activity in navigable waters involving discharge of dredged or fill material, which could include breakwater construction and dredging of the East Harbor.

Compiled by ESA and Orion Environmental Associates, 2004.

Required permits would include a permit from BCDC,⁸ a Section 404 permit from the ACOE, a Section 10 permit from the ACOE, and a Section 401 water quality certification from the RWQCB. The ACOE must consult with the U.S. Fish and Wildlife Service, NOAA Fisheries, and CDFG in the Section 404 permitting processes regarding the likelihood that project activities, including the construction of breakwaters, would affect state or federally listed species or their habitat.

IMPACTS

SIGNIFICANCE CRITERIA

In accordance with the CEQA Guidelines, the San Francisco Planning Department generally considers that implementation of a proposed project would have a significant effect on water quality if it were to substantially degrade water quality.

Additional significance criteria and associated potential impacts related to water quality are addressed in the Initial Study prepared for this project (see Appendix A), with an explanation of why those impacts would not be considered significant.

Criteria for evaluating surface water and groundwater quality in the San Francisco Bay Area are based on beneficial uses and water quality objectives established by the RWQCB, as authorized under the Porter-Cologne Water Quality Control Act and the Clean Water Act. Beneficial uses and water quality objectives are described in the Basin Plan.

IMPACTS

Water Quality Impacts Related to Construction Dredging

Construction dredging in the East Harbor would remove sediments, known to contain PAHs, to a depth of -7 to -11 feet MLLW to provide adequate depth for the boats using the renovated harbor. Because of the levels of PAHs in the sediments that would be left in place, a cap would be constructed to isolate contaminated sediments from the water column once dredging has been completed, as described in Chapter II, Project Description, p. II-6. The East Harbor would be overdredged to a depth of -9 to -13 feet MLLW to allow for placement of the cap. Based on the depth of dredging required for placement of the cap, approximately 93,500 cubic yards of sediment would be dredged from the East Harbor. Sampling indicates that 76,000 cubic yards of dredged sediments would be suitable for in-Bay disposal. The remaining 17,500 cubic yards would require upland disposal, based on total PAH concentrations greater than 5 mg/kg. Construction dredging, installation of a sediment cap, and disposal of dredged materials could affect water quality if water quality protection measures were not implemented as would be required by the dredging permit described below under Permitting Process. Furthermore, during the permitting process, additional regulatory requirements could be imposed that would require

⁸ BCDC requires a permit for any work that involves filling or dredging of the Bay as well as any work within 100 feet of the shoreline. A permit is required for work that is more extensive than a minor repair or improvement.

dredging of additional sediments or construction of additional features to restrict aquatic exposure to the sediments remaining in place. These activities, if required, would be conducted under the oversight of the RWQCB or the appropriate regulatory agency, and measures for the protection of water quality would be specified in any regulatory directives issued for the project.

Proposed dredging activities in the East Harbor would result in short-term disturbance of localized Bay sediments, some of which contain total PAH concentrations as high as 2,961 mg/kg. As is typical for dredging projects, construction dredging of Bay sediments could adversely affect water quality by temporarily resuspending sediments, thereby increasing turbidity. In addition, chemicals such as PAHs that are present in the sediments could be released to the water column during resuspension, which could temporarily degrade water quality. Dredging could also expose deeper sediments with higher concentrations of PAHs to the water column, which could result in long-term degradation of water quality. These effects are discussed below.

Turbidity Effects due to Resuspension of Sediments

Suspended sediments in the water column can lower levels of dissolved oxygen, increase salinity, increase concentrations of suspended solids, and possibly release chemicals present in sediments into the water. The degree of turbidity resulting from the suspended sediments would vary substantially with the quantity and duration of the construction activity and would also depend on the methods used, the quality of equipment, and the care of the operator. In all cases, increased turbidity levels would be relatively short-lived and generally confined to within a few hundred yards of the activity. After initially high turbidity levels, sediments would disperse and background levels would be restored within hours of disturbance.

Substantially depressed oxygen levels (i.e., below 5 milligrams per liter [mg/L]) can cause respiratory stress to aquatic life, and levels below 3 mg/L can cause mortality. However, oxygen levels resulting from project construction activities are not expected to remain low for long periods, and dredging activities would be limited by the dredging permit to periods that avoid the months when sensitive receptors (Pacific herring and salmonids) are most likely to be in the project area (see the Biology section of the Initial Study, Appendix A, for more discussion). Also, tidal flushing would improve depressed oxygen levels by introducing oxygenated water into the project area, and releases of anoxic (oxygen-poor) sediments would occur for relatively short time periods.

Normal circulation and tidal effects in the Bay would generally disperse and dilute the water temporarily affected by construction activities. Therefore, only temporary water quality impacts related to suspended solids in the water column would be expected, and impacts to water quality due to resuspension of sediments would be less than significant.

Water Quality Effects Related to PAHs in the Dredged Sediments

As discussed above, sediments would be resuspended during construction dredging. Because these sediments contain PAHs, water quality in the East Harbor could be temporarily degraded

during construction dredging, resulting in a potentially significant, but temporary, impact to water quality. To further reduce potentially significant water quality impacts to a less-than-significant level, the project sponsor would be required to implement Mitigation Measure HYDRO-1 (see Chapter IV, Mitigation and Improvement Measures, p. IV-5). This measure would control the dispersion of sediments during construction activities and would limit the area subject to these temporary effects. Equipment used for dredging and placement of the cap would be modified or specifically designed to control the dispersion of sediments and achieve precise control over the depth and area of sediment removal. In addition, dredge operators could use automatic rather than manual monitoring of the dredging operations, which would allow continuous data logging with automatic interpretation and automatic adjustments to the dredging operations for real-time feedback for the dredge operator. Automatic systems could also be used to monitor turbidity and other water quality conditions in the vicinity of the dredging operations and allow real-time adjustments by the dredging operators to control temporary water quality effects. Other measures could include the use of silt curtains to reduce dispersal beyond the dredge site, if appropriate. The specific sediment control measures would be selected on the basis of additional sampling that would be conducted to characterize the sediments during the permitting process, discussed below. Although the measures would be subject to ACOE approval, implementation of these measures is included as a mitigation measure because these measures are more stringent than the standard requirements for dredging of noncontaminated sediment. With implementation of the required measures, water quality impacts related to the dredging of sediments containing PAHs would be less than significant.

Water Quality Effects Related to PAHs in Sediments Remaining In Place

The concentration of PAHs in the East Harbor sediments generally increases with depth, and it is likely that construction dredging would expose sediments to the water column that contain higher PAH concentrations than are exposed under existing conditions. However, as described in the Project Description, a cap would be installed to isolate contaminated sediments from the water column once dredging has been completed. The cap would likely be required as part of the dredging permit issued for the project (described below). To further reduce the potential for significant water quality impacts, the project sponsor would be required to implement Mitigation Measures HYDRO-2 and HYDRO-3 (see Chapter IV, Mitigation and Improvement Measures, p. IV-5).

As specified in Mitigation Measure HYDRO-2, the cap would be designed in accordance with applicable engineering criteria and subject to review and approval by the RWQCB. Once the cap is in place, the project sponsor would be required to implement a monitoring program, as specified in Mitigation Measure HYDRO-3, to ensure that the contaminated sediments remain in place as intended, that the cap material is placed correctly and uses the appropriate materials, and that the cap is effective in isolating the contaminated sediments. A detailed monitoring plan, subject to RWQCB approval, would also be prepared during the design phase of the project in accordance with Mitigation Measure HYDRO-3. Implementation of these measures would reduce potentially significant water quality impacts to a less-than-significant level.

Permitting Process

The project sponsor would be required to obtain a new Section 10 permit from the ACOE and an RWQCB water quality certification for the construction dredging and subsequent maintenance dredging (described below), and a new Section 404 permit from the ACOE for disposal of the sediments. In-Bay disposal would be subject to an RWQCB water quality certification and upland disposal of sediments (discussed in Section III.F, Hazardous Materials and Waste) must be conducted in accordance with waste discharge requirements issued to the designated disposal site. Any potentially significant water quality effects from dredging or disposal would be less than significant with implementation of the required permitting process, including the following:

- A sampling and analysis plan (or quality assurance project plan) describing any additional sampling that would be conducted and quality assurance procedures that would be implemented to ensure the collection of data of appropriate quality to support a decision regarding a suitable disposal method. The sampling and analysis plan and quality assurance project plan must be prepared in accordance with U.S. EPA guidance and approved by the DMMO. Additional components can be required for complex dredging projects or those that include dredging of contaminated sediments. Guidance for preparation of sampling and analysis plans and quality assurance project plans is provided in the DMMO document *Sampling and Analysis Plan (Quality Assurance Project Plan) Guidance for Dredging Projects Within the San Francisco District* (DMMO, 1999).
- Sampling in accordance with the approved sampling and analysis plan or quality assurance project plan.
- Submittal of a report to the DMMO documenting the sampling event and providing adequate information to make a decision regarding suitability of the material tested. Based on this report, the DMMO would determine the suitable disposal method for the dredged sediments.
- Submittal of a Consolidated Dredging-Dredged Material Reuse/Disposal Application to the DMMO specifying the planned disposal method (unconfined aquatic disposal; upland disposal, wetland disposal, or reuse; or disposal within the Suisun Marsh Protection Zone) and the specific site planned for disposal. The application must be accompanied by the sampling and analysis plan, testing data, calculations, and the environmental document prepared to comply with CEQA (i.e., this EIR), as well as other supporting documentation. The DMMO agencies would review the permit application and approve or deny the permit.

An RWQCB water quality certification would specify methods for ensuring the protection of water quality during construction activities in the Bay. In addition, specific conditions would include: the use of best management practices to minimize the discharge of construction materials from on-land construction activities; control of floating debris; discharge of displaced water produced during construction of the concrete pilings to minimize discharge of pollutants to the Bay; placement of fueling activities such that they would not affect water quality; and provision of spill containment and cleanup equipment to control potential accidental spills. In place of this water quality certification, the RWQCB could, at its discretion, issue waste discharge requirements specifying equivalent measures for the protection of water quality during construction.

Water quality impacts related to construction activities in the East Harbor would be less than significant with Section 10 permit compliance; implementation of the specified mitigation measures; RWQCB water quality certification, waste discharge requirements and appropriate disposal of dredged materials. Furthermore, the project would remove 17,500 cubic yards of sediment containing elevated levels of PAHs and would install a cap to isolate the remaining sediments containing PAHs from the water column, which would improve water quality compared to existing conditions.

Water Quality Impacts Related to Maintenance Dredging

As with the West Harbor, operation of the renovated marina would require periodic maintenance dredging to sustain the desired depth of sediments in the East Harbor. This dredging would result in short-term disturbance of localized Bay sediments. However, as discussed above, an engineered cap would be placed over the remaining contaminated sediments during construction, which would isolate newly deposited sediments from the existing contaminated sediments. Therefore, sediments removed during maintenance dredging are not expected to contain PAHs.

Maintenance dredging of the clean sediments could adversely affect water quality by temporarily resuspending clean sediments and thus increasing turbidity in Bay waters; the potential water quality effects of this resuspension are discussed above. However, only temporary water quality impacts related to suspended solids in the sediments would be expected. Furthermore, the maintenance dredging would be subject to the requirements of a Section 10 permit from the ACOE and would receive water quality certification from the RWQCB. Therefore, due to the limited extent and temporary nature of dredging activities, isolation of the contaminated sediments with an engineered cap, and compliance with permit requirements, water quality impacts related to maintenance dredging of the East Harbor would be less than significant.

CUMULATIVE IMPACTS

The disposal of dredged materials from the proposed project could result in cumulative impacts to water quality if such disposal significantly contributed to the quantity of dredged materials from other projects in San Francisco Bay. The management of dredging and dredged material disposal in the San Francisco Bay region is coordinated through the Long Term Management Strategy for the Placement of Dredged Material in the San Francisco Bay Region (LTMS). The adopted LTMS Management Plan, a comprehensive regional dredged material management program approved in 2001, promotes beneficial reuse of sediments where practicable, open ocean disposal, and reduced levels of in-Bay disposal in an effort to minimize the amount of sediments disposed of in-Bay (ACOE et al., 2001). Regional long-term goals for specific disposal methods are 40 percent beneficial reuse, 40 percent ocean disposal, and 20 percent unconfined in-Bay disposal. The LTMS agencies established a 12-year transition period to attain these goals through voluntary measures on the part of individual dredgers, and provided for assignment of project-specific disposal allocations if interim goals are not met through voluntary measures. Since initiation of the LTMS in 1998, allowable in-Bay disposal volumes have been reduced by more

than 50 percent compared to pre-LTMS volumes; between 1998 and 2001, over 10 million cubic yards of dredged material has been diverted from in-Bay disposal to approved upland facilities.

The proposed project includes in-Bay disposal of about 76,000 cubic yards of dredged sediments, with upland disposal of about 17,500 cubic yards, based on the chemical quality of the sediments. Although the majority of the sediments from this project would be disposed of in-Bay, the total quantity of sediments is relatively small and the project would therefore not substantially contribute to the rate of in-Bay disposal. In addition, a dredged material management plan would be prepared for the proposed project, as specified in Section III.F, Hazardous Materials and Waste, which would identify alternatives to in-Bay disposal of the sediments. Because of the small quantity of sediments proposed for in-Bay disposal, and preparation of the dredged material management plan, cumulative water quality impacts related to sediment disposal would be less than significant.

F. HAZARDOUS MATERIALS AND WASTE

The Hazards section of the Initial Study (see Appendix A) concluded that the proposed project could result in significant impacts related to dredging and disposal of sediments from the East Harbor. This topic is therefore discussed in the EIR. The Initial Study concluded that potential impacts related to hazardous materials use; hazardous materials that could be present in the soil where landside improvements would be constructed; hazardous building materials that could be encountered during building renovation activities; and emergency response or emergency evacuation plans would be less than significant and are therefore not discussed in the EIR.

SETTING

SEDIMENT QUALITY IN THE EAST HARBOR

As discussed in Section III.E, Hydrology and Water Quality, East Harbor sediments were sampled on five occasions between 1994 and 2000 to characterize the proposed dredge materials for disposal purposes. The sediments collected during these sampling events contained polynuclear aromatic hydrocarbons (PAHs), total recoverable petroleum hydrocarbons (TRPH),¹ pesticides, phthalates, sulfides, total organic carbon, and nitrogen. The metals identified in at least one sediment sample included arsenic, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, and zinc. Soluble metals² were also detected in sediment samples. Polychlorinated biphenyls (PCBs), tributyltin, dibutyltin, monobutyltin, and dissolved sulfides were not detected in any of the sediment samples.

PAHs, a by-product of coal gasification, are the primary chemicals of concern for disposal purposes. Sediments containing PAH concentrations greater than 5 milligrams per kilogram (mg/kg) would generally not be acceptable for in-Bay disposal and would require disposal at an upland facility. The maximum total PAH concentration identified in a sample of the sediment that would be dredged for the project was 2,961 mg/kg. Some PAHs are known carcinogens (i.e., potentially cancer-causing substances).

¹ “Total recoverable petroleum hydrocarbons” is a measure of the total petroleum hydrocarbons in a sample measured by infrared and does not distinguish between the types of hydrocarbons present (such as gasoline or diesel). Unless a cleanup procedure is applied, naturally occurring organic material may also be identified by this method, resulting in an artificially high concentration detected in a sample.

² Soluble metals were determined in accordance with methods specified in state regulations for the classification of hazardous wastes (California Code of Regulations, Title 22, Chapter 11, Appendix II). However, deionized water was used for the extraction in place of the required citrate buffer. The soluble metals results, therefore, represent the concentrations of metals that may be soluble under neutral pH conditions, which is useful for evaluating upland disposal options, but cannot be used for waste classification purposes.

WASTE CLASSIFICATION AND DISPOSAL

The following text discusses the criteria that would be used to classify the sediments containing over 5 mg/kg of PAHs; such sediments would be designated for upland disposal.

Hazardous materials and wastes are defined in the California Code of Regulations, Title 22, Sections 66261.1 through 66261.126. In accordance with these regulations, a waste is classified as hazardous if it exhibits ignitability, corrosivity, reactivity, or toxicity. Section 66261.24 states that a waste is considered toxic if: (1) it contains certain metals or organic substances at soluble concentrations greater than federal regulatory levels using a test method called the toxicity characteristic leaching procedure (TCLP); (2) it contains total concentrations of certain substances greater than the total threshold limit concentration (TTLC) or soluble concentrations greater than the soluble threshold limit concentration (STLC); (3) it contains specified carcinogenic substances at a single or combined concentration of 0.001 percent; or (4) testing indicates toxicity greater than the specified criteria. Table 4 provides the TCLP, TTLC, and STLC criteria and the maximum concentration of each chemical constituent identified in the East Harbor sediments. As indicated in the table, there are no federal or state hazardous waste classification criteria based solely on detected concentrations of PAHs.

Soil classified as hazardous would require disposal as a Class I disposal facility. Class II and III facilities can accept nonhazardous wastes that meet acceptance criteria determined by the state for organic and inorganic compounds. Each landfill has individual acceptance criteria, and the appropriate disposal site for a waste is determined based on the classification of the waste and landfill acceptance criteria. Class II and III landfills in the Bay Area have acceptance criteria for soluble constituents that are lower than the TCLP or STLC.

As shown in Table 4, the maximum concentration of each constituent found in East Harbor sediments is below the TTLC threshold (where regulatory criteria have been established); with the exception of chromium, the constituents are also below the STLC and TCLP thresholds. Chromium was detected at a concentration of 233 mg/kg, which is more than 10 times the STLC threshold of 5 milligrams per liter (mg/L) and 20 times the TCLP threshold of 5 mg/L, but did not exceed the TTLC threshold of 2,500 mg/kg.³ This detection was the maximum concentration of chromium found in the sediment, and the average concentration of chromium in the sediments to be dredged for the proposed project would likely be less. However, it would be necessary to conduct a waste extraction test or TCLP analysis on the sediment to determine if the soluble levels of chromium exceed the regulatory criteria.

³ It would be necessary to perform additional testing to determine if the soluble concentration of chromium would exceed the STLC or TCLP criteria.

**TABLE 4
SOIL DISPOSAL/REUSE CRITERIA AND
MAXIMUM DETECTED ONSITE CONCENTRATION IN EAST HARBOR SEDIMENTS**

Compound	East Harbor Maximum Total Concentration (mg/kg)	Waste Disposal Criteria			Beneficial Reuse Criteria	
		TTLC ^a (mg/kg)	STLC ^b (mg/L)	TCLP ^c (mg/L)	Wetland Surface Material (mg/kg)	Wetland Foundation Material (mg/kg)
Aluminum	NA	–	–	–	–	–
Antimony	NA	500	15	–	–	–
Arsenic	16.5	500	5	5	15.3	70
Barium	NA	10,000	100	100	–	–
Beryllium	NA	75	0.75	–	–	–
Cadmium	0.49	100	1	1	0.33	9.6
Chromium	233	2,500	5	5	112	370
Cobalt	NA	8,000	80	–	–	–
Copper	68.1	2,500	25	–	68.1	270
Iron	NA	–	–	–	–	–
Lead	50.8	1,000	5	5	43.2	218
Manganese	302	NA	–	–	–	–
Mercury	0.409	20	0.2	–	0.43	0.7
Molybdenum	NA	3,500	350	–	–	–
Nickel	120	2,000	20	–	112	120
Selenium	0.51	100	1	1.0	0.64	–
Silver	0.48	500	5	5.0	0.58	0.37
Thallium	NA	700	7	–	–	–
Tin	NA	–	–	–	–	–
Vanadium	NA	2,400	24	–	–	–
Zinc	168	5,000	250	–	158	410
Total PAH	2,961	–	–	–	3.39	44.792
Total DDT	0.025	1	0.1	–	7.0	46.1
Methoxychlor	0.0028	100	10	10	–	–
Dieldrin	0.0039	8	0.8	–	0.72	–
beta-hexachlorocyclohexane	0.0065	–	–	–	0.78	–

NOTES:

- ^a TTLC is the total threshold limit concentration. A waste would be considered hazardous by state regulations if the total concentration of a chemical exceeded the TTLC.
- ^b STLC is the soluble threshold limit concentration. A waste would be considered hazardous by state regulations if the soluble concentration of a chemical exceeded the STLC, determined by a waste extraction test that involves a 10-to-1 dilution of the sample. Thus, the total concentration of a substance would need to exceed 10 times the STLC level for the soluble concentration to possibly exceed the STLC.
- ^c TCLP is the soluble concentration of a metal determined using the toxicity characteristic leaching procedure. A waste would be considered hazardous by federal regulations if the soluble concentration of a chemical in the TCLP extract exceeded the federal regulatory level specified. Because the TCLP involves a 20-to-1 dilution of the sample, the total concentration of a substance in the soil would need to exceed 20 times the regulatory level for the soluble concentration to possibly be greater than the regulatory level in the extract.

NA indicates that the sample was not analyzed for this constituent.

– indicates that a regulatory criterion has not been established for this compound.

Source for waste classification is the California Code of Regulations, Title 22, Section 66261.24.

Source for beneficial reuse criteria is *Beneficial Reuse of Dredged Materials: Sediment Screening and Testing Guidelines* (RWQCB, 2000).

Criteria for Beneficial Reuse of Sediments

The San Francisco Bay Regional Water Quality Control Board (RWQCB) published guidelines for evaluating the beneficial reuse of sediments for wetlands creation and restoration, levee maintenance, construction fill, and daily cover at sanitary landfills (RWQCB, 2000). The guidance contains screening criteria used to determine general suitability for reuse of the dredged material. However, specific upland disposal sites may have criteria that are more or less stringent than the screening criteria, depending on site-specific factors and permit requirements.

Table 4 provides the screening criteria for constituents that have been identified in the East Harbor sediments. The screening criteria are based on two types of reuse: wetland cover material and wetland foundation material. Wetland cover material is dredged material placed in the biotic (upper) zone during a wetlands creation or restoration project. Chemical criteria for this zone are generally the most stringent because this cover material is in contact with flora and fauna. Foundation material is dredged material used in a wetlands creation or restoration project that is covered by surface material. This foundation material is not in contact with flora or fauna, and for this reason the screening criteria are higher than for cover material.

Dredged material that meets the screening guidelines for wetland cover material is likely to be found suitable for most beneficial uses. Dredged material that does not meet the screening criteria for wetland cover material, but meets the criteria for wetland foundation material, is likely to be found suitable for levee maintenance, construction fill, and landfill daily cover (as well as for wetland foundation material), although the chemical concentrations must be protective of human health if humans could come into contact with the dredged material after it is placed. In some cases, sediments containing specific chemicals at concentrations above screening criteria for wetland foundation material may be used for other upland purposes, depending on the potential threat to water quality and the potential for human and environmental exposure. Decisions regarding this upland use would be made based on sampling performed to characterize the materials (discussed in Section III.E, Hydrology and Water Quality) and on the solubility of specific chemical compounds identified in the sediments, and such use would be subject to RWQCB approval.

As discussed in Section III.E, there are six multi-user upland/wetland/reuse sites in the Bay Area that accept dredged sediments from a variety of projects. These sites include Carneros River Ranch, Winter Island, Montezuma Wetlands, Van Sickle Island, Port Sonoma, and the eastern portion of the San Francisco Bar Channel Site. Each of these sites has individual acceptance criteria for dredged sediments, depending on permit requirements. Until the dredged sediments are characterized by the RWQCB, it is not known which of the upland site(s) would be used.

IMPACTS

SIGNIFICANCE CRITERIA

In accordance with the CEQA Guidelines, the San Francisco Planning Department generally considers that implementation of a proposed project would have a significant effect related to hazardous materials and wastes if it were to:

- Involve a substantial risk of accidental explosion or release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation);
- Expose people to existing sources of potential hazards, including hazardous materials; or
- Create a public health hazard or potential public health hazard.

Additional significance criteria and associated potential impacts related to hazardous materials and wastes are addressed in the Initial Study for this project, with an explanation of why those impacts would not be considered significant (see Appendix A).

Threshold levels of hazardous materials and wastes are provided in Title 40 of the Code of Federal Regulations and in Title 22 of the California Code of Regulations. In accordance with these regulations, a hazardous waste is a substance (or combination of substances) that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may pose a substantial threat or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

IMPACTS

Effects Related to Dredging and Disposal of Sediments

Sediments from the area of the East Harbor that would be dredged are known to contain elevated levels of PAHs and would require upland disposal at a permitted facility. Dredging and disposal of these sediments could potentially result in the exposure of people or the environment to elevated levels of hazardous materials, unless appropriate planning and control/mitigation measures are implemented, as discussed below.

Sediment Disposal. Of the approximately 94,000 cubic yards of sediments to be dredged from the East Harbor, approximately 76,000 cubic yards would be suitable for in-Bay disposal, whereas the remaining 17,500 cubic yards would require upland disposal. Based on existing sampling data, the sediments designated for upland disposal would not likely be characterized as a hazardous waste, and portions could be disposed of at a permitted sediment disposal facility (described in the Setting section); used as cover material in a permitted landfill or for another approved upland purpose; or disposed of at a permitted Class II or III disposal facility, each of which would have site-specific limitations on the chemical quality of material that they could accept. Disposal methods for sediments excavated from the East Harbor would be determined based on the results of sampling conducted in accordance with a sampling and analysis plan, to be

approved by the Dredged Material Management Office (DMMO). Disposal at an upland facility could require drying the sediments at a rehandling facility (subject to a waste discharge permit), where sediments would be off-loaded, dewatered, and dried prior to transportation to the final upland disposal site.

Although additional regulatory requirements imposed during the permitting process could require the dredging of additional sediments during construction, disposal options for any additional dredged sediments would be similar to those described above. For all of the sediments, the appropriate disposal method would likely be determined on the basis of total PAH concentrations. Sediments with total PAH concentrations between 5 mg/kg and 44.8 mg/kg (the criteria for reuse as wetland foundation material) would likely be suitable for disposal at a permitted upland disposal facility or for other upland beneficial reuse. Sediments with total PAH concentrations greater than 44.8 mg/kg would likely be suitable for disposal at a permitted Class II or III landfill. Additional sampling could provide further data to delineate specific volumes of sediment that would be appropriate for each disposal method; this sampling would be conducted in accordance with the sampling and analysis plan described above. The appropriate disposal method would be specified in the Consolidated Dredging-Dredged Material Reuse/Disposal Application to the DMMO and would be subject to the approval of the DMMO.

The project sponsor would require the contractor to prepare a dredged material disposal plan specifying methods to segregate sediments for disposal, appropriate disposal methods for sediments, approved disposal sites, written documentation that the disposal site will accept the sediment, procedures and requirements for loading and off-loading sediments to reduce the potential for spillage, and a cleanup plan specifying procedures to be followed if a release occurs. Preparation of a dredged material disposal plan, as specified in Mitigation Measure HAZ-1 (see Chapter IV, Mitigation and Improvement Measures, p. IV-6), is included to facilitate planning for specific disposal methods.

The RWQCB water quality certification, waste discharge requirements, or waiver would also require the use of best management practices to minimize the discharge of construction materials during sediment loading or other on-land sediment handling activities at the marina. These measures would also be incorporated into the dredged material management plan.

Health and Safety. During the dredging and rehandling of sediments, workers and the public could be exposed to PAHs in the sediments through direct contact or indirect ingestion. Workers and the public could also inhale airborne dust during the handling of dried sediments. Without proper precautions, the handling of dredged sediments could create a potentially significant impact. To provide for worker and public health and safety, the project sponsor would require the contractor to prepare a health and safety plan for dredging operations, as specified in Mitigation Measure HAZ-2 (see Chapter IV, Mitigation and Improvement Measures, p. IV-6).

Compliance with the dredging permit and the RWQCB water quality certification, waste discharge requirements, or waiver in addition to implementation of recommended site safety

measures and appropriate disposal of dredged materials would ensure that hazardous materials and waste impacts related to disposal of East Harbor sediments would be less than significant.

CUMULATIVE IMPACTS

Cumulative impacts related to the disposal of sediments on a regional basis are addressed in Section III.E, Hydrology and Water Quality. No cumulative impacts related to hazardous materials and waste are identified.

CHAPTER IV

MITIGATION AND IMPROVEMENT MEASURES

This chapter identifies mitigation measures to reduce potentially significant impacts of the proposed project (described in Chapter III, Environmental Setting and Impacts) to less-than-significant levels. Also included in this chapter are improvement measures that the project sponsor intends to implement as part of the project to further avoid or reduce impacts that are already considered less than significant.

In the course of project planning and design, measures have been identified that would reduce or eliminate potentially significant environmental impacts of the proposed project. Some of these measures have been, or would be, voluntarily adopted by the project sponsor's contractor and thus are proposed as part of the project; some measures are identified in this EIR and are under consideration by the project sponsor. Other measures were identified in the Initial Study and are reiterated in this chapter. Implementation and enforcement of certain measures may be the responsibility of other agencies. Additional measures could be required as conditions of project approval by the responsible agencies, including the Bay Conservation and Development Commission (BCDC), San Francisco Bay Regional Water Quality Control Board (RWQCB), or U.S. Army Corps of Engineers (ACOE).

There are several legal requirements that would serve to mitigate potentially significant impacts; these requirements are summarized for informational purposes. These measures include: limitation of construction-related noise levels, pursuant to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code, 1972); compliance with Chapter 36 of the San Francisco Building Code, "Work Practices for Exterior Lead-Based Paint"; and observance of state and federal Occupational Safety and Health Administration requirements related to the handling and disposing of other hazardous materials, such as asbestos.

Mitigation measures for impacts of the proposed project are provided below. Mitigation measures identified in this EIR (see Section A, below) and in the Initial Study (see Section B, below) would be required as conditions of project approval unless they are demonstrated to be infeasible based on substantial evidence in the record. Section C, below, provides a list of improvement measures that the project sponsor intends to implement as a way to further avoid or reduce impacts that are already considered less than significant.

A. MITIGATION MEASURES IDENTIFIED IN THE EIR

HISTORIC RESOURCES

HIST-1 The San Francisco Department of Public Works shall ensure that the new West Harbor breakwater and associated Americans with Disabilities Act–compliant ramps are designed in accordance with the *Secretary of the Interior’s Standards for Rehabilitating Historic Buildings (Standards)*, so as to avoid damage or substantial alterations to the cobblestone façade of the Fair’s Seawall and nearby stone staircase. The Carey & Co. analysis concludes that there are feasible design solutions to all outstanding and unresolved design issues which would comply with the *Standards*, even though the project sponsor does not yet have a final design. For example, a design consistent with the *Standards* would include a new breakwater and access ramps that, if removed in the future, would not damage the seawall structure or its cobblestone facing. The breakwater should also be compatible with (in terms of materials, massing, and scale), yet clearly differentiated from, the seawall (in terms of design). An additional review for compliance with the *Standards* shall take place during the design development stage of the design process. Like the initial determination report, a subsequent report by a historic preservation consultant will be submitted to the Planning Department’s Preservation Technical Specialist for review and comment on the proposed breakwater design to assure project compliance with the *Standards*.

HIST-2 The San Francisco Department of Public Works shall ensure that renovations to the Harbor Office are consistent with the *Standards*, so as to avoid substantial alterations to this potentially eligible historic resource. The Carey & Co. analysis concludes that there are feasible design solutions to all outstanding and unresolved design issues which would comply with the *Standards*, even though the project sponsor does not yet have a final design. For example, a design consistent with the *Standards* should strive to retain the original front doorway to the Harbor Office to the extent possible. This door could be sealed shut and obscured from the interior, yet be visible from the exterior. The design should also retain all original multi-pane wood-frame windows on the west- and north-facing elevations. The windows on the north-facing elevation could be sealed shut and obscured from the interior, yet be visible from the exterior, to meet the privacy objectives of the project. Finally, the recessed entrance on the eastern side of the building should be retained, unless determined infeasible, in which case these areas should be infilled with basalt cobblestones that complement the cladding found throughout the building.

An additional review for compliance with the *Standards* shall take place during the design development stage of the design process for the Harbor Office. Like the initial determination report, a subsequent report by a historic preservation consultant will be submitted to the Planning Department’s Preservation Technical Specialist for review and comment to assure project compliance with the *Standards*.

SOILS, GEOLOGY, AND SEISMICITY

GEO-1 The project sponsor shall prepare a geotechnical report in compliance with the California Seismic Hazards Mapping Act and the San Francisco Building Code prior to the renovation of the former Degaussing Station. The geotechnical report shall identify seismic hazards and recommend measures to reduce the risk of seismic hazards to an acceptable level. Because of the high potential for liquefaction to occur in this location, the project sponsor shall prepare a quantified analysis, including collection of subsurface information from trenches or borings and geotechnical laboratory testing to evaluate the potential for liquefaction. The final building plans shall incorporate the recommendations of the geotechnical report, and the project sponsor shall obtain review by the Department of Building and Inspection (DBI) prior to construction. The renovations shall not be approved unless the following minimum criteria have been met:

- The nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate measures have been proposed. Technically achievable measures that could be incorporated into the building design may include construction of a concrete mat foundation or a “grade beam” foundation system that would allowing the building to “float” without substantial structural damage in the event of earthquake-induced liquefaction.
- The geotechnical report has been prepared by a registered civil engineer or certified engineering geologist with competence in the field of seismic hazard evaluation and mitigation. The geotechnical report shall contain site-specific evaluations of the seismic hazard affecting the former Degaussing Station, identify portions of the project site containing seismic hazards, and identify any known offsite seismic hazards that could adversely affect the building in the event of an earthquake.
- The lead agency (the DBI for this project) has independently reviewed the geotechnical report to determine the adequacy of the hazard evaluation and proposed measures to reduce identified seismic hazards. The review shall be conducted by a certified engineer with competence in the field of seismic hazard evaluation and mitigation.

Review of the building permit application and geotechnical report by DBI and construction management oversight by the project sponsor as a condition of project approval would ensure that the recommendations of the geotechnical report are appropriately implemented.

GEO-2 The Fair’s Seawall shall be visually inspected where the mole at the foot of Scott Street would be removed, and toe protection similar to existing conditions on the remainder of the seawall shall be installed to protect this newly exposed section of

the seawall from wave action. Structural investigations shall be conducted in the vicinity of the mole removal on a periodic basis, and identified structural defects shall be repaired promptly.

- GEO-3 The project sponsor shall require quantitative modeling for the final design of the breakwater structures to ensure that the breakwaters will perform as intended to protect the harbors from wave action and will not negatively affect Pier 1 and its associated structures. The modeling shall ensure that the project meets the following performance standards: for the East Harbor, a minimum of 50 percent reduction of the design wave for waves from the northeast, and no more than 20 percent increase in design wave height at the Pier 1 piles due to reflection of northeast waves off the floating structure. For the West Harbor, a maximum wave height of 0.5 feet at the berths and the seawall. The quantitative analysis could include collection of field data; structural and geotechnical engineering; physical and/or numerical modeling; and sediment characterization. Monitoring required to measure the potential effects of the project would include periodic visual inspections of Pier 1 for evidence of cracks, scour, or other forms of damage. Identified structural defects shall be repaired promptly by the City. The monitoring program to assess impacts to Pier 1 shall be subject to independent review and closely coordinated between the project sponsor and the National Park Service to ensure agreement on data (including structural baseline information), methods, results and overall duration of the program.

- GEO-4 The project sponsor shall require a geotechnical investigation in the area where the piles for the East Harbor breakwater would be installed, and prepare a pile design analysis to further evaluate the potential pile types and the effects of pile driving. The analysis would be performed to determine if an alternative pile type (such as an open steel pipe instead of concrete or an enclosed system) or installation method (such as predrilling, water-jetting, or using resonance-free vibratory hammers) would minimize vibration and/or liquefaction hazards. If warranted by the analysis, a test pile program shall be conducted to measure underwater vibration as well as piling deflections. If alternative pile types or installation methods would not be effective in minimizing vibration and/or liquefaction hazards, the project sponsor shall conduct vibration monitoring of Pier 1 and associated structures. If construction vibration exceeds an acceptable structural threshold, which shall be designed to assure that vibration from pile-driving does not weaken the structural integrity of Pier 1, pile-driving activities shall cease until an alternative plan can be devised. If no additional alternative pile type or installation methods exist beyond those discussed above to reduce the vibration from pile driving to an acceptable level, the breakwater in the East Harbor shall be constructed after structural improvements to Pier 1 have been completed. The pile design analysis, including a test pile program, shall be subject to independent review and closely coordinated between the project sponsor and the National Park Service to ensure agreement on acceptable vibration thresholds for Pier 1, as well as the alternative pile type or installation methods. The project sponsor

shall accept responsibility for the prompt repair of Pier 1 if pile driving activities in the East Harbor were to unintentionally damage this structure.

- GEO-5 The project sponsor shall construct the floating breakwater at the East Harbor using a guide-pile system that would allow for disconnection of the float from the piles, and shall accept responsibility for assembly/disassembly in the event that such measures are necessary for access to Pier 1, or any damage that may result from such activities. The project sponsor shall also coordinate with the National Park Service regarding the construction schedule and design for the East Harbor breakwater. Construction activities shall be phased if needed to facilitate access to Pier 1 for the planned repairs and improvements by the National Park Service. The project sponsor shall also investigate whether the East Harbor breakwater could be designed and constructed concurrently with NPS's Pier 1 seismic upgrade project, to ensure compatibility between the two structures.

HYDROLOGY AND WATER QUALITY

HYDRO-1 During dredging and placement of the cap, the project sponsor shall require that the contractor(s) employ measures to control dispersion of contaminated sediments. Equipment used for dredging and placement of the cap shall be modified or specifically designed to control the dispersion of sediments and achieve precise control over the depth and area of sediment removal. In addition, the operations could use automatic rather than manual monitoring of the dredging operations, which would allow continuous data logging with automatic interpretation and automatic adjustments to the dredging operations for real-time feedback for the dredge operator. Automatic systems could also be used to monitor turbidity and other water quality conditions in the vicinity of the dredging operations and allow real-time adjustments by the dredging operators to control temporary water quality effects. Another measure could include the use of silt curtains to reduce dispersal beyond the dredge site, if appropriate. The specific measures to be implemented would be selected on the basis of additional sampling that would be conducted to characterize the sediments and would be subject to approval by the ACOE, RWQCB, and other regulatory agencies during the permitting process.

HYDRO-2 The project sponsor shall install a cap over the contaminated sediments; the cap would be designed in accordance with applicable engineering criteria and subject to RWQCB review and approval.

HYDRO-3 The project sponsor shall implement a monitoring program(s) to ensure that the contaminated sediments remain in place, that the cap material is placed correctly and uses the appropriate materials, and that the cap is effective in isolating the contaminated sediments. A detailed monitoring plan describing the monitoring program shall be prepared during the design phase of the project and would require approval from the RWQCB.

HAZARDOUS MATERIALS AND WASTE

HAZ-1 The project sponsor shall require the dredging contractor to prepare a dredged material disposal plan specifying methods to segregate sediment for disposal, appropriate disposal methods for sediments, an approved disposal site, written documentation that the disposal site would accept the sediment, procedures and requirements for loading and off-loading sediments to reduce the potential for spillage, and a cleanup plan outlining procedures to be followed if a release occurs. The contractor would be required to submit the plan to the project sponsor for acceptance and to the NPS for review and input prior to implementation. The plan might also be subject to regulatory approval, and if so, the project sponsor shall require the contractor to comply with all regulatory requirements.

- HAZ-2 The project sponsor shall require the dredging contractor to prepare and implement a site health and safety plan that would identify the chemicals present, potential health and safety hazards, monitoring to be performed during site activities, sediment handling methods required to minimize the potential for exposure to harmful levels of chemicals identified in the sediment, appropriate personnel protective equipment, and emergency response procedures. The plan shall be provided to the project sponsor and NPS for review and input.
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IMPROVEMENT MEASURE

HIST-1 – EAST HARBOR DESIGN GUIDELINES

In order to maintain the distinctive industrial maritime character of the San Francisco Port of Embarkation Historic Landmark District, the project sponsor shall work with the National Park Service/Golden Gate National Recreation Area (NPS/GGNRA) to implement the *East Harbor Design Guidelines*, provided in Appendix B. These guidelines, developed in collaboration among the NPS/GGNRA, the San Francisco Department of Public Works, and the preservation architecture firm Carey & Co., are intended to guide the design of proposed East Harbor elements in terms of materials, scale, texture, site relationships, color, architectural character, and views. The guidelines are consistent with the *Secretary of the Interior’s Standards for Rehabilitating Historic Buildings* and take into account the unique maritime-industrial character of Lower Fort Mason.

- ***VIZ-1 – LOCATION OF THE MAINTENANCE BUILDING***
- Select a location for the maintenance building that maximizes both preservation of the existing open space and protection of existing views. Work with the community to identify the preferred location for the structure.
- ***OTHER-1 – BAY TRAIL SIGNAGE IN THE EAST HARBOR***
- Provide signage or other directional materials as appropriate to indicate the location of the Bay Trail alignment on the marina property, particularly in the East Harbor area. Coordinate with the San Francisco Bicycle Coalition, the National Parks Service, the Fort Mason Foundation, Bay Trail project staff, and other appropriate interested parties in efforts to improve conditions for Bay Trail users on marina property, particularly in the East Harbor area.

B. MITIGATION AND IMPROVEMENT MEASURES FROM THE INITIAL STUDY

MITIGATION MEASURES

MITIGATION MEASURE 1 – NOISE

The project sponsor shall require the construction contractor(s) to use state-of-the-art noise shielding and muffling devices on pile-driving construction equipment and limit pile-driving activity to the hours between 7:00 a.m. and 3:30 p.m.,¹ Monday through Friday. The construction contractors shall notify residences fronting Marina Boulevard, from Baker Street to Casa Way and from Webster Street to Laguna Street. Businesses at the Fort Mason Center shall also be notified prior to the start of construction. The notification shall provide the approximate times of construction and a phone number for any additional questions about construction, or to register complaints regarding construction activities, including noise levels. Pile-driving activities in the East Harbor shall cease during scheduled daytime events at the Fort Mason Center. The San Francisco Department of Public Works shall also coordinate pile-driving construction schedules

¹ Since publication of the Initial Study on March 19, 2005, the NPS/GGNRA has requested that pile driving cease at 3:30 p.m. instead of 8:00 p.m., as was originally published. In addition, the prohibition of pile driving from 11:30 a.m. to 1:30 p.m. has been eliminated to allow for at least eight hours of construction work per day. This revised construction schedule has been accepted by the project sponsor and would be implemented.

in the East Harbor with Fort Mason and its proposed renovations to Pier One. Coordination shall include meetings, phone calls, or other discussions with the Fort Mason Center, to be initiated by the San Francisco Department of Public Works, prior to finalization of the City's construction schedule for the proposed East Harbor breakwater.

Other measures to reduce noise associated with pile-driving activities shall include the following:

- Implement “quiet” pile-driving technology (such as pre-drilling of piles, water-jetting, resonance-free vibratory hammers, and the use of more than one pile-driver to shorten the total pile-driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions.
- Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings such as Building A at Fort Mason, such as the installation of noise-absorbent baffling or other barrier-type material to be placed at strategic locations on the western side of Building A.

MITIGATION MEASURE 2 – CONSTRUCTION AIR QUALITY

The following control measures recommended by the Bay Area Air Quality Management District shall be implemented during construction:

- All exposed soils shall be watered at least twice daily during construction. Watering shall be sufficient to prevent airborne dust from leaving the site. Increased watering frequency shall occur, as necessary, whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used for site watering, if available.
- All trucks hauling soil, sand, and other loose materials shall be covered, or at least 2 feet of freeboard shall be maintained (i.e., the minimum required space between the top of the load and the top of the trailer).
- All paved access roads, parking areas, and any paved areas used for staging shall be swept daily (using reclaimed water, if possible).
- At the end of each day, if visible soil material is carried onto nearby paved roads, streets shall be swept (using reclaimed water, if possible).
- Construction vehicles shall use paved roads to access the construction site wherever possible.

MITIGATION MEASURE 3 – ENVIRONMENTAL SITE ASSESSMENTS AND HEALTH AND SAFETY PLAN

Prior to the start of construction, the project sponsor shall retain a qualified professional (e.g., a California-registered environmental assessor) to conduct a Phase I environmental site assessment for the landside areas of the proposed project site. The assessment would conform with standards adopted by the American Society for Testing and Materials for Phase I environmental site assessments and would identify land uses that currently or historically have stored or generated

hazardous materials and evaluate whether releases of hazardous materials have occurred that could affect soil or groundwater quality at the site. The assessment would include recommendations for further investigation of the site, if necessary.

If the Phase I environmental site assessment were to indicate that a release of hazardous materials could have affected soil quality at the site, the project sponsor would retain a qualified environmental professional to conduct a Phase II environmental site assessment to assess the presence and extent of contamination at the site, in conformance with state and local guidelines and regulations.

If the sampling identifies surface and/or subsurface contamination in areas subject to ground disturbance during construction, the area would be remediated in accordance with the standards, regulations, and determinations of local, state, and federal regulatory agencies. The project sponsor would coordinate with the San Francisco Department of Public Health and any other applicable regulatory agencies to adopt contaminant-specific remediation target levels. The excavated soil would be removed and disposed of at an approved disposal facility.

All reports and plans prepared in accordance with this mitigation measure shall be provided to the San Francisco Department of Public Health and to any other appropriate agencies identified by the Department of Public Health. When all hazardous materials have been removed from existing buildings, and soil and groundwater analysis and other activities have been completed, as appropriate, the project sponsor shall submit to the San Francisco Planning Department and the Department of Public Health (and any other agencies identified by the Department of Public Health) a report stating that the mitigation measure has been implemented. The report shall describe the steps taken to comply with the mitigation measure and include all verifying documentation. The report shall be certified by a registered environmental assessor or similarly qualified individual who states that the mitigation measure has been implemented, and specifying the actions that have been implemented.

Potential hazards to construction workers and the general public associated with exposure to hazardous materials in soils or groundwater during construction would be mitigated by the preparation and implementation of a site-specific health and safety plan. The health and safety plan would meet the requirements of federal, state, and local environmental and worker safety laws. Specific information to be provided in the plan includes identification of contaminants, potential hazards, material handling procedures, dust suppression methods, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment to be used during construction to verify health and safety of the workers and the public, measures to protect public health and safety, and emergency response procedures.

MITIGATION MEASURE 4 – ARCHAEOLOGICAL RESOURCES

The following mitigation measure is required to avoid potential adverse effects due to the accidental discovery of buried or submerged historical resources, as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department

archaeological resource ALERT sheet to the prime contractor; to any subcontractor(s) (including firms hired to perform demolition, excavation, grading, foundation, pile driving, etc.); and to any utilities providers involved in soil- or Bay-bottom-disturbing activities at the project site. Prior to any soil- or Bay-bottom-disturbing activities, each contractor is responsible for circulating the ALERT sheet to all field personnel, including machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities providers) confirming that all field personnel have received copies of the ALERT sheet.

In the event that evidence of an archaeological resource is encountered during soil- and Bay-bottom- disturbing activities, the head foreman and/or project sponsor shall immediately notify the ERO and shall suspend soil- or Bay-bottom-disturbing activities in the vicinity of the discovery until the ERO, in consultation with the California State Lands Commission (CSLC), has determined what additional measures should be undertaken.

If the ERO, in consultation with the CSLC, determines that an archaeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archaeological consultant. The archaeological consultant shall advise the ERO as to whether the discovery is an archaeological resource, retains sufficient integrity, and is of potential scientific, historical, or cultural significance. If an archaeological resource is present, the archaeological consultant shall identify and evaluate the resource. The consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO, in consultation with the CSLC, may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include in-situ preservation of the archaeological resource or an archaeological evaluation program. If an archaeological evaluation program is required, it shall be consistent with the Major Environmental Analysis division of the Planning Department guidelines for such programs.

The project archaeological consultant shall submit a Final Archaeological Resources Report (FARR) to the ERO and the CSLC that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate, removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO and the CSLC for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey, Northwest Information Center shall receive one copy, and the ERO shall receive one copy of the FARR. The Major Environmental Analysis division and the CSLC shall receive two copies of the FARR, along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation pertaining to NRHP/CRHR eligibility. In instances of

high public interest or interpretive value, the ERO and the CSLC may require a different final report content, format, or distribution than those presented above.

IMPROVEMENT MEASURES FROM THE INITIAL STUDY

The project sponsor intends to implement the following improvement measures.

IMPROVEMENT MEASURE 1 – “DRY FIRING” DURING PILE DRIVING

Prior to any pile driving, contractors shall “dry fire” before commencing pile driving if marine mammals are identified within 150 feet of the work area. The U.S. Coast Guard Pier in Monterey, California, has employed dry firing to “herd” California sea lions away from worksites during the installation of piles. A dry fire occurs when the hammer is raised and dropped without compressing the pistons, which produces approximately 50 percent of the maximum in-air noise level. This technique allows pinnipeds to voluntarily move from the area before the hammer is operated at full capacity and thus exposes fewer animals to loud sounds both underwater and above water.

IMPROVEMENT MEASURE 2 – PUBLIC EDUCATION ACTIVITIES

The project sponsor shall conduct public education activities to inform people of harbor rules and the importance of protecting water quality within the marina. As part of this program, signs shall be posted at locations accessible to marine tenants and the visiting public. The signs shall describe the locations and encourage the use of sewage and restroom facilities, oily water pumpout facilities, and the used oil and oil-filter recycling kiosk. The program shall educate tenants about potential water quality impacts related to the use of cleaners, solvents, and paints for boat cleaning and maintenance; encourage tenants to restrict the use of these materials; provide information about more environmentally sound alternatives to the use of these materials; and encourage tenants to minimize underwater hull cleaning and maintenance.

CHAPTER V

OTHER CEQA TOPICS

This chapter discusses other required CEQA topics, including significant and unavoidable environmental effects of the proposed project, growth-inducing impacts, and areas of controversy and issues to be resolved.

A. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21067 of the California Environmental Quality Act (CEQA), and with Sections 15040, 15081, and 15082 of the CEQA Guidelines, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, or by other mitigation measures that could be implemented, as described in Chapter IV, Mitigation and Improvement Measures. This chapter is subject to final determination by the San Francisco Planning Commission as part of the certification process for the EIR. If necessary, this chapter will be revised in the Final EIR to reflect the findings of the Planning Commission.

Implementation of the mitigation measures identified in Chapter IV, Mitigation and Improvement Measures, would reduce potentially significant impacts to a less-than-significant level. No significant and unavoidable impacts of the project were identified.

B. GROWTH-INDUCING IMPACTS

Projects are considered growth inducing if they foster economic or population growth or the construction of additional housing, directly or indirectly, that could have a significant effect on the environment. Typically, growth inducement occurs when a project extends urban services or transportation infrastructure to previously unserved or under-served areas, or removes barriers to development.

As described in the Population section of the Initial Study (Appendix A), the project would continue the existing marina operations, and City and County of San Francisco employees would continue to staff the Harbor Office and support marina operations and maintenance, with no substantial change in employment levels. Thus, the project would not change the demand for housing due to increased employment. Furthermore, the project would not construct new housing, nor would it permit live-aboards or houseboats within the marina, as is the current policy.

While the overall number of berths would be reduced under the proposed project, the average slip size could increase from approximately 32 feet to 38.5 feet (a 17 percent increase), potentially accommodating somewhat larger boats. Although larger boats can accommodate more people than smaller boats, a 17 percent increase in average boat length would not have a measurable effect on the average number of people on the boats, nor would it directly correspond to substantially more people at the marina. Therefore, the proposed project would not have a substantial growth-inducing impact.

Project improvements could attract additional visitors to the marina's public areas for day use of the boat hoist, hand boat launches, and improved restrooms, but increased visitation is not expected to be substantial. Use of these facilities would be short term in nature, and the hours of operation and public visitation would remain unchanged. The project would shift both office workers and visitors from the existing Harbor Office to the Degaussing Station, which would be renovated into a new Harbor Office. However, overall usage levels of this facility are not expected to increase compared to existing use or visitation levels. Therefore, the project would not result in significant effects related to growth inducement.

C. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

This section discusses areas of controversy and issues to be resolved, primarily stemming from comments received during the public scoping process. This section also provides additional information or clarifications in response to comments that have not been addressed in other sections of this EIR, or in the Initial Study published on March 19, 2005.

COMMENTS RECEIVED DURING THE PUBLIC SCOPING PROCESS

On October 27, 2004, the Planning Department held a public scoping meeting to receive public input on the proposed project. Individuals and agencies that received notice of the public scoping meeting included owners of properties within 300 feet of the project site; tenants of the project site, including boat owners; tenants of properties adjacent to the project site; and other potentially interested parties, including various regional and state agencies. On March 19, 2004, the Planning Department published a Notice of Preparation and an Initial Study, which was made available to these same individuals and agencies. Concerns about the proposed project that were raised during the public involvement efforts included: clarity of the project description; the project's consistency with plans and policies; the project's visual and aesthetic compatibility with existing marina structures and views from the adjacent Golden Gate National Recreation Area; the project's effect on circulation and parking in Lower Fort Mason and in the Marina District; the project's effect on adjacent historic resources; dredging operations; construction noise; air emissions; nighttime lighting; sedimentation; risk of fuel spills; and cumulative impacts. Most of these concerns are addressed in Chapter III, Environmental Setting and Impacts, of this EIR, or were addressed in the Initial Study, included in Appendix A. The following section provides additional information or clarification on issues not previously addressed in this EIR or in the Initial Study.

ADDITIONAL INFORMATION OR CLARIFICATION IN RESPONSE TO COMMENTS RECEIVED DURING PUBLIC SCOPING

TRANSPORTATION AND PARKING

Request that the EIR quantify construction trip traffic and define peak and nonpeak commute hours.

As discussed in the Initial Study, p. 24, the project's ultimate design and construction bidding process would determine the most feasible construction methods. It is expected that much of the heavier construction materials to be used at the marina, such as large-diameter rocks for the riprap revetments and breakwaters, sections of the floating docks and breakwaters, concrete piles, and fill for the engineered cap, would be brought in by barge. This construction material delivery method via San Francisco Bay would avoid local roadways and reduce, if not eliminate, potential conflicts with peak-hour traffic in the project vicinity (peak-hour traffic generally occurs from 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m.).

Given that the exact construction methods or the mode of travel by which materials and workers would be transported to and from the site have not been established (i.e., truck vs. barge), it would be premature to quantify the number of truck trips and construction worker trips, and such quantification would likely be inaccurate. As part of the review process leading up to project construction, the project sponsor would be required to attend a meeting of the Interdepartmental Staff Committee on Traffic and Transportation with representatives of City departments, including Parking and Traffic, Police, Public Works, and Muni, to determine feasible traffic management and mitigation measures to reduce traffic congestion, if any, during construction of this project and other nearby projects. As a result, no significant construction traffic impacts associated with the proposed project are expected, and further discussion of this topic in the EIR is not required.

Request that EIR evaluate changes in parking rates and use of the trailered boat parking area on neighborhood parking.

As discussed in the Initial Study, p. 23, under the proposed project the number of parking spaces at the East and West Harbor parking lots would not change, and current parking restrictions would remain in effect. Presently, boat owners are given two parking stickers, which do not guarantee a parking space but do allow vehicles to remain parked after park hours and on weekends and holidays in "marina only" spaces. In February 2005, the Recreation and Park Department proposed changes to its fee structure (including parking sticker fees) for the marina. At this time, however, no changes to the existing fees have been approved by the Department. If approved in the future, however, changes in parking fees would not affect parking regulations or the overall number of parking spaces for boaters and nonboaters. In addition, an increase in fees would not substantially displace nonboater parking as boat owners attempt to seek free parking at the marina or elsewhere in the vicinity, creating a substantial traffic or parking impact either onsite or offsite. As a result, no significant impacts to parking are expected as a result of a

potential future change in the parking fee structure at the marina, and further discussion of this topic in the EIR is not required.

Once renovations to the boat hoist have been completed, the trailered boat parking area would allow for parking of up to 24 trailered boats. Reuse of the trailered boat parking area would not directly displace or reduce the number of parking spaces at the marina or elsewhere in the vicinity, as trailered boats would only be allowed to park in this designated area. As with the current parking policy, trailered boat parking would be prohibited in other areas of the marina or the vicinity. Under project conditions, the use of the marina by owners of small craft would likely fluctuate day to day, as it currently does. Overall marina usage, estimated by the harbormaster to be a maximum of about 20 boat trips per day in the summer, with less than half that amount during the remainder of the year, would be similar under project conditions. If small-craft boaters arrived at the renovated boat hoist and were unable to find a parking space in the boat trailer storage area, then they would likely leave the marina and search for another boat launch site in the area, as trailered boat parking would be prohibited in other areas of the marina or the vicinity, as is the current parking policy. Given the daily fluctuation and the relatively low number of boat trips at the marina even during peak periods, it is unlikely that the number of small-craft boaters who could not find sufficient trailered boat parking under project conditions would create a substantial traffic or parking impact as they seek other put-in/take-out options in the vicinity. Thus, further discussion of this topic in the EIR is not required.

Request that the EIR clarify that planned renovations to Pier 1 would not likely occur at the same time as the improvements to the East Harbor due to delays in funding, and request that at least 10 feet between the wave attenuation structure and Pier 1 be maintained.

Due to delays in funding, it is unlikely that renovations to Pier 1 would occur in the same timeframe as the proposed breakwater improvements in the East Harbor. In the event that such overlapping construction schedules were to occur, however, this could cause a minor short-term cumulative impact related to the visitor experience at Fort Mason Center. Thus, the EIR considers this impact to be potentially significant. If construction overlap were to occur, the impact could be mitigated with careful project planning between the Fort Mason Foundation and the Department of Public Works (see Mitigation Measure 1, Initial Study, p. 71). As currently designed, the proposed East Harbor breakwater would be 10 to 20 feet from Pier 1, and the float could be disconnected from the guidepiles, thus providing construction equipment access to Pier 1.

NOISE

Request that EIR evaluate the noise impacts due to operation of the renovated boat hoist.

Noise impacts were discussed in the Initial Study, pp. 27–30. The following paragraphs provide additional information about project noise effects. To estimate the amount of noise that would be

generated by the renovated boat hoist, a noise sample of the boat hoist at the St. Francis Yacht Club was taken on May 20, 2005 using a standard sound-level meter.¹ The electrical winches on this boat hoist would be similar to the ones proposed for use in the East Harbor, and therefore make an appropriate comparison. The sampling found that the winches generate a noise level of approximately 67 dBA² at 25 feet and about 63 dBA at 50 feet. The background daytime noise level in both the West and East Harbors was approximately 60 dBA. The closest sensitive receptor to the renovated boat hoist would be the tenants and visitors to Building A at Fort Mason Center, which is about 100 feet to the northeast from the hoist. Given that noise attenuates with distance, the exterior of this building would be exposed to a noise level of less than 60 dBA from the hoist when it would be in use. Given that outside of the laboratory, a 3-dBA change is considered a just-perceivable difference, the noise generated by the hoist would not be distinguishable from the background noise. Moreover, since the building would serve to further dampen any noise from the outside, tenants and visitors inside Building A would be unlikely to perceive a change in noise level when the hoist is in use. As such, no substantial noise impacts associated with operation of the East Harbor boat hoist are expected, and no further discussion of this issue is required in the EIR.

Noise associated with trailered boat parking would include noise from the operation of cars and/or trucks hauling and parking boats (primarily engine noise) in an area that is currently used as a parking lot, and in an area that could only accommodate a maximum of 24 trailered boats. As a result, tenants and visitors inside Building A would be unlikely to perceive a change in noise that is distinguishable from background noise levels in this area. Therefore, no substantial noise impacts associated with operation of the East Harbor trailered boat parking area are expected, and no further discussion of this issue is required in the EIR.

Request that pile driving for construction of the East Harbor breakwater be restricted to the hours between 7:00 a.m. and 3:30 p.m.

Mitigation Measure 1 from the Initial Study, p. 71, originally required pile-driving activities for construction in the East Harbor to be restricted to the hours between 7:00 a.m. and 8:00 p.m., in accordance with the San Francisco construction noise ordinance. After publication of the Initial Study on March 19, 2005, the National Park Service/Golden Gate National Recreation Area requested that pile-driving activities be further restricted to the hours between 7:00 a.m. and 3:30 p.m., to reduce the noise effects on Fort Mason tenants and visitors. The reference to the prohibition of pile driving during the lunchtime period was eliminated from the measure to allow for an eight-hour work day. Therefore, Mitigation Measure 1 in the Initial Study has been revised as shown below.

¹ Noise sample taken by Geraldina Grunbaum, ESA, May 20, 2005. Samples taken at midday and with a full load (19-foot Boston Whaler).

² Decibel (dB) is a measure of the pressure level, or loudness, of a sound. Because the human ear is generally not equally sensitive to all sound frequencies, sound is often measured to correspond to the human ear's decreased sensitivity to low and extremely high frequencies and greater sensitivity to mid-range frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA).

REVISED MITIGATION MEASURE 1 FROM INITIAL STUDY, p. 71

The project sponsor shall require the construction contractor(s) to use state-of-the-art noise shielding and muffling devices on pile-driving construction equipment and limit pile-driving activity to the hours between 7 a.m. and 3:30 p.m., Monday through Friday. The construction contractors shall notify residences fronting Marina Boulevard, from Baker Street to Casa Way and from Webster Street to Laguna Street. Businesses at the Fort Mason Center shall also be notified prior to the start of construction. The notification shall provide the approximate times of construction and a phone number for any additional questions about construction, or to register complaints regarding construction activities, including noise levels. Pile-driving activities in the East Harbor shall cease during scheduled daytime events at the Fort Mason Center. In the event that construction schedules would overlap, the San Francisco Department of Public Works shall also coordinate pile-driving construction schedules in the East Harbor with the Fort Mason Foundation and its proposed renovations to Pier 1. Coordination shall include meetings, phone calls, or other discussions with the Fort Mason Foundation, to be initiated by the San Francisco Department of Public Works, prior to finalization of the City's construction schedule for the proposed East Harbor breakwater. (All other measures to reduce noise, as described in Mitigation Measure 1, remain the same.)

UTILITIES

Request that EIR evaluate increased electrical consumption associated with larger boats.

As noted in the Initial Study, p. 36, utilities and public services are already provided in the project area. The proposed project would include upgraded electrical and water services to the new floating docks, which would incrementally increase demand for and use of public services and utilities on the site. Although increased electrical usage could occur at the marina under project conditions (given that somewhat larger boats could be accommodated at the marina, and larger boats generally consume larger amounts of electricity), the increased electrical usage is not expected to be substantial. In addition, the project site is currently served by an electrical system with sufficient capacity to provide for marginally increased usage at the marina without the need to construct new utilities either on or off the site, and electrical increases would not greatly exceed anticipated levels of service in the area. Thus, the proposed project is not expected to have a measurable impact on public services or utilities, and no further discussion of this issue is required in the EIR.

CHAPTER VI

ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies four alternatives to the proposed project and discusses environmental impacts associated with each alternative, as well as the project-related impacts that would be avoided, reduced, or remain the same if the alternative were adopted. Each alternative is also compared to the project sponsor's objectives described in Chapter II, Project Description. Project decision-makers could adopt any of the following alternatives, if feasible, instead of approving the proposed project.

A. NO PROJECT

DESCRIPTION

This alternative would entail no renovations to or development of the site. Under this alternative, the project setting would remain substantially as it is today. It is possible that the Recreation and Park Department would undertake small-scale repairs at specific locations as needs become critical, but no large-scale renovation would occur.

IMPACTS

The No Project Alternative would result in no substantial changes to the project site. As is the case with the proposed project, the existing variety of recreational and open space uses on the project site would remain. Unlike the project, however, there would be no renovation of either the West Harbor or East Harbor, nor would the former Degaussing Station be renovated and reoccupied as the Harbor Office. With this alternative, there would be no changes to public scenic views or vistas, or any change in views of the marina.

Under the No Project Alternative, marina facilities such as the wood docks, slips, and pilings would continue to deteriorate slowly due to wave action and because the wood materials are well beyond their useful life expectancy, potentially causing a greater safety hazard than would exist compared to the proposed project.

The No Project Alternative would avoid or reduce nearly all of the potentially significant impacts associated with the proposed project, including alterations to the potentially historic Harbor Office, exposure to seismic risk in connection with reoccupancy of the former Degaussing Station, and geologic and historic resource impacts related to removal of the north-south mole from the Fair's Seawall. Thus, no mitigation measures to reduce these effects would be required under the No Project Alternative. This alternative would also not result in any impacts related to

wave action, vibration from pile driving, or access to Pier 1 resulting from construction of new breakwaters that would occur under the proposed project, and no mitigation for these impacts would be required.

Unlike the proposed project, this alternative would not result in disturbance of contaminated sediments in the East Harbor, and therefore this alternative would have no temporary construction-related effects on water quality. The No Project Alternative, unlike the proposed project, would not result in installation of an engineered cap of clean fill to isolate contaminated sediments from the water column following the completion of dredging. With no dredging, this alternative would not expose people or the environment to elevated levels of polynuclear aromatic hydrocarbons. However, this alternative would not result in long-term improvements to water quality in the East Harbor as compared to the proposed project.

This alternative would also avoid the operational and construction impacts described in the Initial Study, such as construction-related traffic, noise, and air quality impacts; incremental changes (both increases and decreases) in operational emissions from vessels; effects on fish, marine mammals, and aquatic habitat; and effects on archaeological resources. Unlike the proposed project, the No Project Alternative would not require mitigation for the following significant impacts identified in the Initial Study: generation of construction-period noise and vibration; construction air quality impacts; potential exposure to landside hazardous materials, including polychlorinated biphenyls (PCBs); and potential accidental discovery of archaeological artifacts. Unlike the proposed project, the No Project Alternative would not include Improvement Measure 1 from the Initial Study (“dry firing” during pile driving to alert marine mammals), nor would it include Improvement Measure HIST-1 (*East Harbor Design Guidelines*), as these would no longer apply. However, the project sponsor might still implement Improvement Measure 2 from the Initial Study (conduct public education activities to inform people of harbor rules and the importance of protecting water quality within the marina).

COMPLIANCE WITH PROJECT SPONSOR’S OBJECTIVES

The No Project Alternative would not comply with any of the project sponsor’s objectives, including objectives #1: provide a safer, more modern marina with a longer useful life; #2: protect marina structures from locally generated wind-waves from the north and northeast directions; #3: provide a slip-size distribution that more closely matches market demand; #4: expand and modernize the Harbor Office and relocate the Harbor Office to a site proximate to both the West and East Harbors; and #5: better serve marina tenants as well as the general public by providing new and improved facilities, including new docks and walkways, and new publicly accessible walks at the East Harbor; new and upgraded toilet facilities and showers (including new disabled access); new and repaired boat launch facilities at both harbors and a refurbished guest dock at the West Harbor; upgraded facilities for boat sewage pumpout; and enhanced landscaping.

B. NO NEW WEST HARBOR BREAKWATERS

DESCRIPTION

Alternative B would include all project components with the exception of the two new breakwaters proposed at the mouth of the West Harbor under the proposed project. The existing moles at the foot of Scott Street would also remain in place. This alternative would include construction of a new floating breakwater at the East Harbor, as well as renovated boat slips in both harbors, the renovation of the former Degaussing Station to serve as the Harbor Office, improvements to and expansion of restrooms and tenant showers, repair of the East Harbor boat hoist, construction of a new maintenance building, improved public access, and all other components of the proposed project.

IMPACTS

Most impacts under Alternative B would be the same as those described for the proposed project, with the primary exceptions related to visual quality, historical resources, and geology, soils, and seismicity. As this alternative would not construct new breakwaters in the West Harbor, there would be incrementally less visual change than under the proposed project. New docks and slips would be constructed with a similar orientation in the inner harbor of the West Harbor and would contain potentially larger boats, resulting in similar visual changes as the proposed project (as shown in Figure 8B, p. III.B-11, but without the simulated breakwaters). However, the renovated slips and docks in the West Harbor would deteriorate faster than under the proposed project, as they would be unprotected from wind-driven waves from the north and northeast.

The analysis in Section III.C, Historic Resources, found that the southernmost of the two new West Harbor breakwaters could potentially result in an adverse effect on the historic Fair's Seawall. This potential impact would not occur under this alternative, and thus Mitigation Measure HIST-1 would not be required. As planned renovations to the Harbor Office would still occur under this alternative, potential impacts to this historical resource associated with the renovation efforts would remain the same, and thus Mitigation Measure HIST-2 would also apply to this alternative.

With regard to geology, soils, and seismic impacts, seismic risks associated with reoccupancy of the former Degaussing Station would also occur under Alternative B, and thus Mitigation Measure GEO-1 requiring a geotechnical investigation and report would apply to this alternative as well. As the existing north-south mole would remain under this alternative, any impacts associated with its removal and exposure of the Fair's Seawall to wave action would not occur. As the design of the East Harbor breakwater for this alternative has not been finalized, it is possible that the breakwater might not perform as intended, with unknown onsite and offsite impacts. Quantitative modeling, monitoring, and repair if necessary, as described under Mitigation Measure GEO-3, would mitigate this impact to a less-than-significant level. Quantitative modeling for breakwaters in the West Harbor would not be required as these would not be a part of Alternative B.

Like the proposed project, vibration impacts to Pier 1 associated with pile driving for construction of the East Harbor breakwater would occur under Alternative B, as this portion of the project would remain. Impacts associated with construction access impediments to adjacent Pier 1 and the requirement for construction schedule coordination would also occur. Mitigation Measure GEO-5 would reduce these potentially significant impacts to a less-than-significant level.

Like the proposed project, temporary construction impacts to water quality would occur under Alternative B, as dredging of contaminated sediments in the East Harbor would occur. Mitigation Measures HYDRO-1, -2, and -3 would reduce these potentially significant impacts to a less-than-significant level. Impacts associated with dredging and disposal of potentially hazardous dredge sediments would also occur under Alternative B. Mitigation Measures HAZ-1 and -2 would reduce these potentially significant impacts to a less-than-significant level.

The construction and operational impacts of Alternative B would be generally similar to, but slightly less than, those of the proposed project. The elimination of the West Harbor breakwaters would somewhat reduce the effects associated with construction-related noise, air quality, hazardous materials, and archaeological resources compared to the proposed project, but these impacts would remain significant under Alternative B. Mitigation Measures 1, 2, 3, and 4, as described in the Initial Study, would reduce these potentially significant impacts to a less-than-significant level. Although this alternative would only include improvements at the East Harbor, neither the proposed project nor this alternative is expected to result in substantial changes to the use or operation of the overall marina.

Improvement Measures 1 and 2 from the Initial Study (“dry firing” during pile driving, and public education activities) could also occur under Alternative B, as would Improvement Measure HIST-1 (East Harbor Design Guidelines).

COMPLIANCE WITH PROJECT SPONSOR’S OBJECTIVES

Alternative B would only partially satisfy the project sponsor’s objectives. This alternative would not fully satisfy objective #1: to provide a safer, more modern marina with a longer useful life, nor objective #2: to protect marina structures from locally generated wind-waves from the north and northeast directions, as only half of the marina (the East Harbor) would be made safer and would be protected from the damaging effects of wind-generated waves. In the West Harbor, while slip and dock improvements would occur, this area would continue to be subject to the damaging effects of wave action. The Department of Boating and Waterways (DBW) strongly recommends the installation of breakwaters in any area subject to damaging wave activity in order to protect the investment that the City and DBW would be making in the renovated marina structures.

This alternative would fully or partially meet objectives #3, #4, and #5, as it would generally provide a slip-size distribution that more closely matches market demand, would renovate both the Harbor Office and the former Degaussing Station, and would provide new and improved

docks and walkways, publicly accessible walks at the existing East Harbor breakwater, new and upgraded toilet facilities and showers, and new and repaired boat launch facilities at both harbors.

C. WEST HARBOR RENOVATION ONLY

DESCRIPTION

Under Alternative C, improvements to the West Harbor would proceed as designed under the proposed project, including new breakwaters, renovated slips and docks, and removal of the moles at the foot of Scott Street. Additionally, the Harbor Office would be moved to the former Degaussing Station, and the Degaussing Station building would be renovated, as under the proposed project. However, under this alternative, no waterside or landside improvements would occur in the East Harbor, including new slips and docks, floating breakwater, public pathway, harbor dredging, boat hoist renovations, restroom upgrades and expansion, or construction of a new maintenance building. It is possible that the Recreation and Park Department would undertake small-scale repairs at specific locations as needs become critical, but no large-scale renovation would occur.

IMPACTS

Impacts associated with Alternative C would be somewhat reduced when compared to those of the proposed project, because construction would be undertaken only at the West Harbor and at the former Degaussing Station, with no work to be done at the East Harbor. For example, because a new East Harbor breakwater would not be constructed, potentially significant impacts associated with geology and soils, such as pile-driving vibrations and construction access issues with Pier 1, would not occur. As no dredging would occur in the East Harbor, there would be no potential to disturb the contaminated sediment at the East Harbor, and potentially significant impacts to water quality would not occur. As no dredging would occur in the East Harbor, the potentially significant impacts associated with dredging and disposal of hazardous materials would also not occur.

However, because Alternative C would not include placement of an engineered cap over the remaining contaminated sediments in the East Harbor, this alternative would not provide the potential long-term improvements to water quality that would result under the proposed project. In addition, the slips and docks in the East Harbor would continue to deteriorate because they would be exposed to 100 percent of the north and northeast waves.

Because Alternative C would also construct a new breakwater that would attach to the face of the Fair's Seawall, potentially significant impacts to this structure as a historic resource would also occur. Mitigation Measure HIST-1 would reduce this potentially significant impact to a less-than-significant level. Similarly, because Alternative C would also include renovations to the Harbor Office, potentially significant impacts to this building as a historic resource would also occur.

Mitigation Measure HIST-2 would reduce this potentially significant impact to a less-than-significant level.

Like the proposed project, potentially significant seismic risks associated with reoccupancy of the former Degaussing Station would occur under Alternative C. Mitigation Measure GEO-1 would reduce this potentially significant impact to a less-than-significant level. Similarly, as the existing north-south mole would be removed under Alternative C, the potentially significant impacts associated with exposure to wave action and potential damage would also occur. Mitigation Measure GEO-2 would reduce this potentially significant impact to a less-than-significant level. As the designs of the West Harbor breakwaters for this alternative have not been finalized, it is possible that these breakwaters might not perform as intended, with unknown onsite or offsite impacts. Quantitative modeling, monitoring, and repair if necessary, as described under Mitigation Measure GEO-3, would mitigate this impact to a less-than-significant level.

Visual changes associated with renovations to the West Harbor would be generally similar to those described in Section III.B, Visual and Aesthetic Resources. No visual changes would occur in the East Harbor, and the area would appear as it does under existing conditions (see Figure 5A, p. III.B-6).

The construction and operational impacts of Alternative C would be generally similar to, but slightly less than, those of the proposed project. The elimination of the East Harbor breakwater would somewhat reduce the effects associated with construction-related noise, air quality, hazardous materials, and archaeological resources compared to the proposed project, but these impacts would remain significant under Alternative C. Mitigation Measures 1, 2, 3, and 4, as described in the Initial Study, would reduce these potentially significant impacts to a less-than-significant level. Although this alternative would include improvements at the West Harbor only, neither the proposed project nor this alternative are expected to result in substantial changes to the use or operation of the overall marina.

Improvement Measures 1 and 2 from the Initial Study (“dry firing” during pile driving to alert marine mammals, and public education activities) would also occur under Alternative C; however, Improvement Measure HIST-1 (*East Harbor Design Guidelines*) would not apply, as no changes to the East Harbor would occur under Alternative C.

COMPLIANCE WITH PROJECT SPONSOR’S OBJECTIVES

Alternative C would not fully satisfy the project sponsor’s objective #1: to provide a safer, more modern marina with a longer useful life, nor objective #2: to protect marina structures from locally generated wind-waves from the north and northeast directions, as only half of the marina (the West Harbor) would be made safer and protected from the damaging effects of wind-generated waves. In the East Harbor, this area would continue to be subject to the damaging effects of wave action. The DBW strongly recommends the installation of breakwaters in any area subject to damaging wave activity in order to protect the investment that the City and DBW would be making in the renovated marina structures. Objective #3 would be only partially

satisfied, as only half of the slips in the West Harbor would have a slip-size distribution that more closely matches market demand, while those in the East Harbor would remain unmatched with market demand. This alternative would meet objective #4, as it would renovate both the Harbor Office and the former Degaussing Station. Alternative C would only partially meet project objective #5, as it would provide new and improved docks and walkways, new and upgraded toilet facilities and showers, and new and repaired boat launch facilities to only one of the harbors. In addition, Alternative C would not provide for enhanced public access because it would not install a public pathway atop the existing East Harbor breakwater.

None of the impacts of this alternative would be more severe than those of the proposed project, and a number of impacts would be less substantial, more so than the other three alternatives. Therefore, this alternative would be considered the environmentally superior alternative, in accordance with CEQA Guidelines Section 15126.6(e)(2).

D. REMOVAL OF THE FORMER DEGAUSSING STATION AND EXPANSION OF THE HARBOR OFFICE

DESCRIPTION

Waterside improvements under Alternative D would be the same as those described for the proposed project and would include new breakwaters, slips, and docks in both the East and West Harbors, as well as dredging in the East Harbor. Landside improvements would also be the same as those for the proposed project, except that the former Degaussing Station would not be renovated for use as the Harbor Office, and the existing Harbor Office would be slightly expanded. Under this alternative, the former Degaussing Station would be demolished and the area returned to open space or surface parking. The existing building where the Harbor Office is located would be renovated as under the proposed project. Under this alternative, the building would continue to serve as both the Harbor Office and a public restroom and tenant showers. The existing building would be expanded 200 to 400 square feet to the east to accommodate disability access upgrades for the restrooms and showers, but the 100 square feet of existing office space that currently serves the harbormaster would remain as is and would not be converted to tenant restrooms and showers.

IMPACTS

Impacts of Alternative D would be the same as those of the proposed project, with the exception of visual, historic, and geologic/seismic impacts. In terms of visual effects, the former Degaussing Station would no longer be visible along the water's edge north of the Marina Green (see Figure 7A, p. III.B-10, but without views of the building), which could be considered a beneficial effect by providing greater public views of the Bay. However, expansion of the Harbor Office by 200 to 400 square feet to the east to accommodate disability access upgrades for the restrooms and showers would be visible from various locations in the West Harbor. The expansion of the existing Harbor Office would only be readily apparent to close-in observers.

Because the single-story building has a relatively low profile, the expansion would not be very noticeable, if at all, from mid-range viewpoints, such as that shown in Figure 9, p. III.B-14. This relatively small expansion of an existing building would not likely create a substantial visual impact or block important views from public locations. Visual changes associated with all other components of Alternative D would be generally similar to those described in Section III.B, Visual and Aesthetic Resources.

Depending on the ultimate design of the Harbor Office expansion, this alternative could result in a significant impact to the building's status as a potentially eligible historic resource, as described in Section III.C, Historic Resources. Mitigation Measure HIST-2, requiring compliance with the *Secretary of the Interior's Standards for Rehabilitating Historic Buildings* for any expansions and renovations to this building, would reduce this impact to a less-than-significant level. The former Degaussing Station was not found to be eligible as a historic resource under CEQA, and therefore its demolition would not result in a significant impact to historic resources.

As the former Degaussing Station would be removed under Alternative D, seismic risks associated with reoccupancy of the building would not occur. However, the existing areawide liquefaction risk would remain the same, with or without the former Degaussing Station.

Removal of the Degaussing Station would have slightly greater construction-related air quality and hazardous materials impacts than the proposed project, such as exposure to asbestos, lead-based paint, and construction dust during building demolition. Demolition of the former Degaussing Station could also result in accidental damage to subsurface archaeological resources, if present in the vicinity. Mitigation Measures 1, 2, 3, and 4 identified in the Initial Study for fugitive dust control, handling procedures for contaminated building waste, and standard measures for accidental discovery of archaeological resources would also reduce the construction-related effects of Alternative D.

As with the proposed project, potentially significant impacts associated with dredging and disposal of contaminated sediment in the East Harbor, construction vibration and access impacts to Pier 1 associated with the East Harbor breakwater, and potential impacts to the Fair's Seawall due to the removal of the north-south mole and construction of the southernmost breakwater in the West Harbor would also occur under Alternative D. Mitigation Measures HIST-1, GEO-2 through -5, HYDRO-1 and -2, and HAZ-1 and -2 would reduce these impacts to a less-than-significant level.

Improvement Measures 1 and 2 from the Initial Study ("dry firing" during pile driving, and public education activities) would also occur under Alternative D, as would Improvement Measure HIST-1 (*East Harbor Design Guidelines*).

COMPLIANCE WITH PROJECT SPONSOR'S OBJECTIVES

Alternative D would meet the project sponsor's objectives with the exception of part of objective #4: expand and modernize the Harbor Office and relocate the Harbor Office to a site proximate to

both the West and East Harbors. Alternative D would not relocate the Harbor Office to a site proximate to both the East and West Harbors, but would expand and modernize the existing Harbor Office in its current location in the West Harbor.

The Recreation and Park Department believes that Alternative D would not be as satisfactory as the proposed project because the existing Harbor Office site is relatively constrained, which could preclude expansion and modernization of the Harbor Office as planned. Alternative D would also eliminate a Harbor Office near both the East and West Harbors. Finally, this alternative would not permit improvement of the West Harbor restrooms/tenant showers, except to improve disabled access, because the space required to meet this project objective was to come from the existing office space in the Harbor Office building.

CHAPTER VII

DRAFT EIR DISTRIBUTION LIST

Notices of availability of the Draft EIR were mailed or delivered to nearly 1,700 recipients. The recipients included interested persons, groups, and organizations, and project area property owners and tenants. Due to the unusually large size of the distribution list for this project, the list is not included in the EIR. The distribution list, however, is available for review by appointment at the San Francisco Planning Department, 1660 Mission Street, Suite 500, as part of Case File No. 2002.1129E.

The list of those who received a copy of the Draft EIR is provided on the following pages. These recipients included applicable state and regional agencies, City and County of San Francisco boards and commissions, as well as interested parties or individuals who requested a copy of the Draft EIR.

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● CHAPTER VIII

SUMMARY OF COMMENTS AND RESPONSES

TABLE OF CONTENTS

	<u>Page</u>
A. INTRODUCTION	C&R-1
B. LIST OF PERSONS COMMENTING	C&R-2
C. SUMMARY OF COMMENTS AND RESPONSES	C&R-5
1. General Comments	C&R-6
2. Project Description	C&R-17
3. Land Use, Plans, and Policies	C&R-44
4. Visual and Aesthetic Resources	C&R-61
5. Historic Resources	C&R-73
6. Soils, Hydrology, and Seismicity	C&R-79
7. Hydrology and Water Quality	C&R-96
8. Hazardous Materials and Waste	C&R-99
9. Traffic, Parking, and Pedestrian Safety	C&R-108
10. Alternatives	C&R-127
11. Comments Addressing the Initial Study	C&R-139
D. STAFF-INITIATED TEXT CHANGES	C&R-155

ATTACHMENT 1: Comment Letters

ATTACHMENT 2A: Public Hearing Transcript (October 6, 2005)

ATTACHMENT 2B: Public Hearing Transcript (January 12, 2006)

ATTACHMENT 3: Draft Post Project Berth Movement Policy (August 2006)

A. INTRODUCTION

This document contains public comments received on the Draft Environmental Impact Report (Draft EIR, or DEIR) prepared for the proposed San Francisco Marina Renovation Project, and responses to those comments. Also included in this document are staff-initiated text changes.

Following this introduction, Section B contains a list of all persons and organizations who submitted written comments on the Draft EIR and who testified at the two public hearings on the Draft EIR held on October 6, 2005 and January 12, 2006.

Section C contains summaries of substantive comments on the Draft EIR made orally during the public hearing and received in writing during the public comment period, from September 6, 2005 through January 20, 2006.¹ Comments are grouped by environmental topic and generally correspond to the table of contents of the Draft EIR; where no comments addressed a particular topic, however, that topic appears under the “General Comments” section of this document. The name of the commenter and the date of the letter or public hearing testimony are indicated following each comment summary.

Section D contains text changes to the Draft EIR made by the EIR preparers subsequent to publication of the Draft EIR to correct or clarify information presented in the DEIR, including changes to the DEIR text made in response to comments.

Some of the responses to comments on the Draft EIR provide clarification regarding the DEIR; where applicable, changes have been made to the text of the DEIR, and are shown in double underline for additions and ~~striketrough~~ for deletions.

Many comments made both in writing and at the public hearing were directed towards the perceived merits or demerits of the Renovation Project. Responses to these comments are limited, as they do not concern the adequacy or accuracy of the EIR.

The comment letters received and the transcripts of the public hearings are reproduced in Attachments 1 and 2, respectively.

These comments and responses will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated in the Final EIR, as indicated in the responses.

¹ Although the DEIR public comment period was originally intended to close on October 20, 2005, the comment period was subsequently extended to January 20, 2006 at the request of the Planning Commission.

B. LIST OF PERSONS COMMENTING

Written Comments

Federal Agencies

Brian O'Neill, United States Department of Interior, GGNRA, letter, January 19, 2006

State Agencies

Timothy C. Sable, Department of Transportation, letter, September 20, 2005

Denise M. Tsuji, Department of Toxic Substances Control (DTSC) Northern California Coastal Cleanup Operations Branch, letter, October 5, 2005

Regional Agencies

Maureen Gaffney, San Francisco Bay Trail, Association of Bay Area Governments, letter, October 19, 2005

Michelle Burt Levenson, San Francisco Bay Conservation and Development Commission (BCDC), letter, October 20, 2005

Organizations and Individuals

Organizations

Judith Berkowitz, Coalition for San Francisco Neighborhoods, letter, October 6, 2005

Sue Chang, Marina Community Association, letter, January 19, 2006

Joan Girardot, Marina Civic Improvement & Property Owners Association, two letters, October 6, 2005, January 19, 2006.

Robert C. Doss, PG&E, letter, October 19, 2005

Stuart M. Flashman, San Francisco Bay Chapter of the Sierra Club, letter and fax, October 20, 2005

Alan Silverman, Marina Community Association, two letters, October 1, 2005, and January 18, 2006

Howard Strassner, Sierra Club San Francisco Group, fax, January 17, 2006

Andy Thornley, San Francisco Bicycle Coalition, letter, January 19, 2006

Dee Dee Workman and Michael Alexander, San Francisco Beautiful, letter, January 18, 2006

Alexander Zwissler, Fort Mason Center, letter, January 17, 2006

Individuals

Anonymous, letter, October 6, 2006
Edward J. Barret, fax, September 27, 2005
Nathaniel Berkowitz, letter, October 18, 2005
Ralph Kanz, e-mail, October 20, 2005.
Will LeRoy, letter, undated.
Greg Milano, letter, October 18, 2005
Ronald J. Mulcare, fax, September 27, 2005
Bruce Munro, letter, October 16, 2005
Richard H. Robinson, letter, September 6, 2006
Michael Spiegel, letter, September 27, 2005
Brian W. Veit, letter, October 17, 2005.

Speakers at the Public Hearing, October 6, 2005

Marilyn Amini
Judy Berkowitz
Nathaniel Berkowitz
Sue Chang
David Cincotta
Francisco Decosta
Joan Girardot
Emeric Kalman
Suzanne Lifson
Rene Monchatre
Lois Rosano
Jill Sinclair
Don Wessing

Planning Commissioners Michael Antonini, Shelley Bradford-Bell, Bill Lee, Dwight Alexander

Speakers at the Public Hearing, January 12, 2006

Yomi Agunbiade, General Manager, San Francisco Department of Recreation and Park
Michael Alexander
Nathaniel Berkowitz
Rob Black
Sue Chang
John Evans
Gloria Fontanello
Maureen Gaffney
Joan Girardot
Emeric Kalman
Suzanne Lifson
Ray Lotto
Ron Mulcare
Bill Palmer
Dick Robinson

Frank Rollo
Alan Silverman
Michael Spiegel

Planning Commissioners Christina Olague, Sue Lee, Michael Antonini, Bill Lee, Kevin Hughes

C. SUMMARY OF COMMENTS AND RESPONSES

At the regularly scheduled meeting of the Planning Commission on October 6, 2005, Planning Department staff made an informational presentation concerning the San Francisco Marina Renovation Project DEIR, after which the public hearing began. Several commenters requested an additional hearing and an extension of the public comment period. Commissioners granted an additional public hearing on November 3, 2005, with an invitation to the Department of Recreation and Park, a request for the Landmarks Board to review the DEIR,² and an extension of the written public comment period to November 10, 2005.

The second public hearing on the San Francisco Marina Renovation Project DEIR was postponed to the regularly scheduled meeting of the Planning Commission on January 12, 2006. Two separate agenda items on this project were heard during the meeting; the first was an informational presentation by the Department of Recreation and Park to describe the proposed project to the Commissioners and the general public, and the second was a hearing to receive public comments on the DEIR. The comment period for written comments was extended by the Planning Commission to January 20, 2006.

The comments have been organized according to the following environmental topic areas:

1. General Comments
2. Project Description
3. Land Use, Plans, and Policies
4. Visual and Aesthetic Resources
5. Historic Resources
6. Soils, Geology and Seismicity
7. Hydrology and Water Quality
8. Hazardous Materials and Waste
9. Traffic, Parking, and Pedestrian Safety
10. Alternatives
11. Comments Addressing the Initial Study

Each comment is numbered and followed by a corresponding numbered response. In some cases, comments that are substantively identical have been grouped and addressed with a single response. Comments from individual commenters may be divided among several topic areas.

² A public hearing on the DEIR was held at the regularly scheduled meeting of the San Francisco Landmarks Preservation Advisory Board (LPAB) on October 5, 2006.

1. GENERAL COMMENTS

COMMENT 1.1

The Marina Draft EIR is before you today illegally and in violation of Administrative Code Chapter 29. Section 29.5 states:

“The Planning Department shall not undertake environmental review of a project unless a copy of the Board of Supervisors resolution, finding the proposed project fiscally feasible and responsible, is submitted to the Planning Department.”

(Jill Sinclair, Public Hearing Transcript, October 6, 2005)

No finding by the Board of Supervisors that the proposed project is fiscally feasible and responsible was submitted to the Planning Department and to this date no such finding has been made by the Board of Supervisors. I ask you today to suspend these proceedings and postpone this hearing because the project sponsor still has not submitted to the Board of Supervisors the material required by Section 29.3 for determination of a finding of fiscal feasibility. *(Jill Sinclair, Public Hearing Transcript, October 6, 2005)*

Chapter 29 of the code was clearly designed to prevent the expenditure of public money on an environmental impact report, until the Board of Supervisors has determined that the proposed project is fiscally feasible and responsible. Section 29.7 originally required any proposed project that had not completed environmental review as of January 27, 2004 to suspend the review. Section 29.7 was amended on July 19, 2005 to allow such reviews to continue, provided that the project sponsor submits to the Board of Supervisors within 30 days of effective date of the ordinance the materials required for a determination of fiscal feasibility. *(Alan Silverman, October 1, 2005)*

The amended Section 29.7 requires material for a determination of fiscal feasibility to have been submitted to the Board of Supervisors within 30 days of the effective date of the ordinance. As of the date of this letter the required material has not been considered by the Board of Supervisors. Furthermore, there is no authority to approve the 37% increase in marina berthing fees and therefore there is no established feasibility for the Marina Project. In any case, it appears that the current environmental review process is violating the provisions of Section 29 of the Administrative Code. I urge you to suspend this process until the Board of Supervisors has taken all appropriate actions to remedy the matter. *(Alan Silverman, October 1, 2005)*

Thus we find ourselves in a situation where the DEIR was started in March 2005 in direct violation of Chapter 29. The attempt to retroactively correct this problem by amending Section 29.7 does not correct the problem because the Board of Supervisors has been told by the Budget Analyst and the Mayor's Office of Finance that the approved fee schedule enacted by the Mayor does not make the project financially feasible or fiscally responsible. *(Alan Silverman, Marina Community Association, January 18, 2006)*

This plan is flawed. I ask that you send it back and have something more economical. *(Rene Monchatre, Public Hearing Transcript, October 6, 2005)*

Allowing this project to proceed as proposed may well result in the City using general funds that should be spent in disadvantaged areas to subsidize a harbor used by wealthy boat owners who do not even live in San Francisco. That is an “economic and social effect” as described in CEQA section 15131. (*Alan Silverman, Marina Community Association, January 18, 2006*)

The Marina Renovation Project DEIR was undertaken, prepared and completed in violation of Chapter 29 of the San Francisco Administrative Code which mandated that environmental review of this project be suspended until a finding of fiscal feasibility and responsibility for this project was made by the Board of Supervisors. Although the Board amended Chapter 29 in July, 2005 to allow the Marina Renovation Project DEIR to be released for public review, that amendment in no way ameliorates the illegality of its preparation. Please comment on this and explain to the public why preparation of this DEIR was undertaken, in violation of Chapter 29. Note: As of this date, the proposed Marina Project has not been found to be fiscally feasible and responsible as required by Chapter 29. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 1.1

San Francisco Administrative Code Chapter 29, to which the commenters refer, contains a process established by the Board of Supervisors for Board consideration of the fiscal feasibility of certain types of projects proposed by City departments. The ordinance does not alter the requirements of the CEQA statute, CEQA Guidelines or San Francisco Administrative Code Chapter 31 that pertain to the process for preparing, or the content of, CEQA documents. In addition, Section 15131 of the CEQA Guidelines states that social or economic effects of a proposed project shall not be treated as environmental impacts. As the comment does not pertain to the adequacy of the EIR, this response is provided for informational purposes.

The Board of Supervisors adopted Chapter 29 on June 4, 2004 and amended the ordinance on July 29, 2005 by Ordinance No. 172-05. Section 29.7 of the amended ordinance provides that the ordinance applies to certain types of projects that had commenced but not completed environmental review as of January 27, 2004. The marina project is such a pending project because the Planning Department had issued a preliminary negative declaration for the marina project in December 2003, but the City had not completed environmental review as of January 27, 2004.³ Chapter 29, as amended by Ordinance No. 172-05, requires the Planning Department to continue processing the environmental review documents for pending projects like the marina project. Section 29.7 states: “This Chapter 29 shall apply to any proposed project that has not completed environmental review pursuant to the California Environmental Quality Act as of January 27, 2004. In the event environmental review has commenced for a proposed project, the Planning Department shall not suspend its environmental review of the project, provided that the Project Sponsor submits to the Board of Supervisors, within thirty (30) days of the effective date of this amended ordinance No. 172-05, the materials required by Section 29.3 for a determination of fiscal feasibility. If a Project

³ Chapter 29 applies to ‘environmental review’ under CEQA, and not specifically to preparation of an EIR. Therefore, the fact that a Notice of Preparation of the EIR for the proposed project was issued in 2005 is irrelevant because environmental review of the project, in the form of a Mitigated Negative Declaration, began in 2003 before Chapter 29 was adopted.

Sponsor does not submit the required information within the 30-day period, the Planning Department shall suspend its review until such information is submitted.

The Department of Recreation and Park has submitted the materials required by Section 29.3 to the Board of Supervisors. The materials were submitted to Supervisor Tom Ammianno's office with copies to the other Supervisors and to the Clerk of the Board of Supervisors on June 19, 2005, with a revised version submitted to the Clerk on September 12, 2005. Therefore, Planning is required by Chapter 29 to continue processing the environmental review documents. Chapter 29 does not require the Board to have rendered a decision on the fiscal feasibility of the project before the Planning Commission certifies the FEIR.

Please also see the Department of Boating and Waterways (DBW's) assessments of project's financial feasibility.⁴ The 2005 DBW report with regard to second phase funding for the West Harbor improvements provides the following summary about financial feasibility; "It is expected that the requisite factors necessary to establish the project's financial feasibility will be met. There is adequate capital to finance the project, estimated revenues exceed estimated expenses, and there is adequate collateral for the proposed loan."

The proposed project would not be funded by the General Fund, but rather by bonds backed by marina revenues.

COMMENT 1.2

I have my own series of issues with the EIR. I don't want to sit and draw on and go through them. But I think I would definitely be supportive of extending the public comment process. I don't know that I want to do another hearing, but I definitely want to extend the public comment process and my thought is to at some point in November, November 6th, first week in November. (*Vice-President Alexander, Public Hearing Transcript, October 6, 2005*)

We have 650 users of the marina. They don't have the benefit to follow what happened here. And we need more time. (*Emeric Kalman, Public Hearing Transcript, January 12, 2006*)

Response 1.2

As requested by various Planning Commissioners at the public hearing on October 6, 2005, the Planning Department extended the end of the public comment period for the DEIR from October 20, 2005, to January 20, 2006, an increase of 90 days beyond the required 45-day public review period.

⁴ Department of Boating and Waterways (DBW), San Francisco Marina – West Harbor. *First Phase Funding*. November, 2004. And, *Second Phase Funding*. Boating and Waterways Commission Meeting, November 17 & 18, 2005.

COMMENT 1.3

Chapter 5, growth inducing impacts, indicates the project would not construct new housing, nor would it permit live-aboard or houseboats within the Marina as is the current policy. So my question is, is this removal of live-aboard and houseboats, the removal of housing, and if so, shouldn't there be some analysis of replacement housing for the tenants. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

Response 1.3

In stating on page V-1 that "...the project would not construct new housing, nor would it permit live-aboards or houseboats within the marina, as is the currently policy," the DEIR is indicating that under current policy, people are not permitted to live on their boats. While the Department of Recreation and Park acknowledges that a small number live-aboards currently reside at the marina, such persons are in violation of existing marina policies.

According to Section 15 of the Rules and Regulations of the San Francisco Marina Small Craft Harbor, boaters may "use a vessel in the marina for eating and sleeping purposes for a period not to exceed seventy-two (72) hours in any seven day period." While enforcement of such rules is difficult due to the lack of a regular patrol and inspection just for live-aboards, staff makes every effort to curtail an increase in live-aboards by informing new tenants of the rules and enforcing other rules, such as sewage and sanitary rules.

As these policies would remain unchanged by the proposed project, tenants who currently live aboard their boats would be given the same opportunity to berth at the marina, both during and after reconstruction, as the existing tenants who do not currently violate the live-aboard policy.

Therefore, no "replacement housing" for tenants would be required as part of the proposed project.

COMMENT 1.4

CEQA establishes a broad policy to regulate both private and public activities which may cause an effect on the environment. *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247. No deference is to be given to the Staff's determination that a DEIR is adequate. *Sierra Club v. County of Sonoma* (1992) 6 Cal.App. 4th 1307, 1318. (*Ronald J. Mulcare and Edward J. Barrett, September 27, 2005*)

Response 1.4

Comment noted. The Planning Commission will make a determination regarding the adequacy of the EIR at the EIR certification hearing.

COMMENT 1.5

We suggest that you combine all mitigations from the Initial Study and EIR into one mitigation table for easier reference and review. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 1.5

All mitigation measures from the DEIR and the Initial Study were provided in a single chapter of the DEIR (Section IV, Mitigation and Improvement Measures). Due to the length of the text, these measures were more appropriately summarized in a chapter than in a table.

COMMENT 1.6

Issues raised in the Appeal and letter were not adequately addressed in the DEIR. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, October 6, 2005*)

I am the author of the Appeal of the Mitigated Negative Declaration submitted to you on February 9, 2004 on behalf of Marina Civic Improvement & Property Owners Association and individually named Appellants. I re-submitted that Appeal to the Planning Commission on October 6, 2005 for further evaluation in the Final EIR, because the issues raised in the Appeal were incompletely addressed in the Draft EIR, specifically:

- Impacts on the Marina Green, an historic resource eligible for listing on the NRHP
- Impacts of West Harbor Breakwaters
- Seismic Issues
- Visual Quality
- Increase in Bay fill without benefit to the general public
- Socio-Economic Impacts
- Impacts of (anticipated) increased Percentage of Power Boats vs. Sailboats
- Impacts of Trailered Boat Storage & Circulation Overcrowding at Entrance to Lower Ft. Mason

(*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 1.6

The responses provided below identify where in the DEIR each of the commenter's concerns were addressed, along with an explanation of the environmental analysis undertaken to address such concerns.

Impacts on the Marina Green.

Potential impacts to the Marina Green from the proposed project are addressed in Chapter III. Environmental Setting and Impacts, specifically in Section III.A, Land Use Plans and Policies, Section III.B, Visual and Aesthetic Resources, and Section III.C, Historic Resources. Page III.A-8 of the DEIR states that, "With the project, there would be no change to the existing variety of recreational and open space uses on the project site. Furthermore, the project would not disrupt or divide the physical arrangement of the Marina Green, nor adversely affect ongoing recreational uses" Page III.A-10 further states that, "The proposed project would not substantially affect any of the existing offsite, adjacent uses and activities, such as the open space in the Marina Green" Page III.C-10 of the DEIR states that, "The proposed project would not result in direct effects

to the Marina Green, as this historic resource is located outside of the project area, and no changes are proposed to it.” As described in Section III.B, Visual and Aesthetic Resources, “the proposed project would not have a demonstrable negative aesthetic effect, nor would it substantially degrade or obstruct scenic views from public areas, including the Marina Green. The new maintenance building and expanded restrooms in the East Harbor open space area would be noticeable from only the easternmost portions of the Marina Green and would not constitute a significant visual change in the open space area. Therefore, the historic setting of the Marina Green would not be substantially altered to the extent that it would no longer qualify as a historic resource, and no significant impact would occur.” The DEIR evaluates potential impacts on the Marina Green and concludes that the proposed project would not have a significant impact.

Impacts of the West Harbor Breakwaters.

Potential impacts of the proposed West Harbor breakwaters are addressed in Chapter III. Environmental Setting and Impacts, primarily in Section III.B, Visual and Aesthetic Resources, Section III.C, Historic Resources, and Section III.D, Soils, Geology, and Seismicity. Page III.B-8 of the DEIR states that, “The proposed waterside improvements would include two new breakwaters in the West Harbor. One of the new breakwaters would be visible in the foreground, as shown from Viewpoint 4 [Figure 4, page III.B-5], approximately 500 feet east of the existing Harbor Office, and would extend about 200 feet into the harbor [see Figure 8B, page III.B-11]. The addition of the breakwater would not result in an adverse visual effect, because a rock-filled type breakwater would be visually consistent with the basalt cobblestone facing of the Fair’s Seawall, nor would it obstruct views, because the proposed breakwaters would be at grade with the seawall and jetty (approximately 8 feet above mean high tide). The second breakwater would extend from the outer jetty, and would also be visually consistent with the riprap facing along the outer jetty, and would be minimally visible in the mid-ground. As shown in the simulation, the new breakwaters would not substantially obstruct views of the Bay, Golden Gate Bridge, Angel Island, Alcatraz, or the Marin Headlands, and such panoramic views would continue to be available under project conditions.”

Page III.C-8 of the DEIR states that, “The proposed project would construct a new breakwater and ADA-compliant ramp in the outer basin of the West Harbor that would abut the Fair’s Seawall. The breakwater would be perpendicular to the seawall and would extend about 200 feet into the outer basin of the West Harbor, likely attaching to the face of the seawall for about 15 to 20 feet. In addition, the new ramp would descend from the top of the seawall to a new floating dock.... As the final designs for the breakwater and the Americans with Disabilities Act (ADA) ramp have not been completed, it is possible that these improvements could damage or substantially alter the Fair’s Seawall, including its sloped, cobblestone face and possibly one of its stone staircases, both of which are considered character-defining features of this resource. Substantial alteration to a historically significant resource is considered a potentially significant impact under CEQA. Mitigation Measure HIST 1 requires that the new West Harbor breakwater and access ramps be designed in accordance with the Standards, which would reduce the impact to a less-than-significant level.”

Pages III.D-11 – 12 of the DEIR state that, “The Breakwater Improvement Study (Moffat & Nichol, 2004), included in Appendix C, was conducted to evaluate: (1) the potential effects of proposed breakwater construction on sedimentation and erosion rates both on and off the site; (2) the attenuation of wave energy; (3) potential effects on the adjacent Fort Mason structures due to reflected wave energy; and (4) circulation within the harbors. This feasibility-level modeling, based on standard assumptions, familiarity with site-specific issues, and professional judgment, provides an estimate of the maximum potential effects of the project. Typical daily operations as well as storm events were considered as part of the evaluation. The assumptions and conclusions of the study were peer-reviewed for accuracy by an independent engineering firm (Coast & Harbor Engineering, 2004); the report is available for review at the Planning Department.As final designs of the breakwaters have not been determined, it is possible that the breakwaters might not perform as intended, thus resulting in potentially significant onsite and offsite impacts if preconstruction quantitative modeling of the breakwater designs were not conducted. However, as specified in Mitigation Measure GEO-3 (see Chapter IV, Mitigation and Improvement Measures, p. IV-4), preconstruction quantitative modeling would be conducted on the final breakwater designs to ensure that the breakwater structures would perform as intended. This quantitative analysis, to be conducted during the design phase of the project using the actual dimensions of the structures, could include collection of field data; structural and geotechnical engineering; physical and/or numerical modeling; and physical or chemical sediment characterization. Monitoring (including visual monitoring for evidence of cracks, scour, or other forms of damage) would be required to measure the potential effects of the project. Identified structural defects would be repaired promptly. Implementation of this measure would ensure that potential geological and seismological impacts associated with installation of the proposed breakwaters would be less than significant.” The DEIR evaluates potential impacts resulting from the proposed West Harbor breakwaters and identifies potential impacts and mitigation measures for the expected effects of the proposed project.

Visual Quality.

Potential project-related impacts to visual quality are addressed in Section III.B, Visual and Aesthetic Resources. The section provides six visual simulations of the proposed project (pages III.B-6 – B-11) which were prepared to provide an understanding of the effect of the project on existing views from a variety of vantage points. This section also describes the visual effects of the proposed project, and concludes with the following statement (page III.B-17): “Although visual quality is subjective, it can reasonably be concluded that the proposed project would not result in a substantial, demonstrable negative aesthetic effect on the visual character or quality of the area and its surroundings.” The DEIR identified no significant impacts of the proposed project on visual or aesthetic resources.

Increase in Bay fill without benefit to the general public.

The comment refers to benefits to the general, non-boating public. Potential increases in Bay fill resulting from the project are identified in Section II, Project Description, Table 1, Proposed Landside Improvements, and Table 2, Proposed Waterside Improvements. Potential public benefits

of the project are identified on Figure 3, Proposed Site Plan, on page II-7. Some of the benefits to the general (i.e., non-boating) public from the proposed project are provision of public access along a portion of the existing [East Harbor] breakwater, renovation and expansion of the East and West Harbor restrooms, and creation of two ADA-compliant ramps leading two public hand boat launch and guest docks (one in each harbor).

Potential public benefits of the project are also described in Section III.A, Land Use, Plans, and Policies. Page III.A-7 of the DEIR identifies the project site as being within the aegis of the San Francisco Bay Plan (Bay Plan), adopted in 1969 by the San Francisco Bay Conservation and Development Commission (BCDC). BCDC is chartered, pursuant to the McAteer-Petris Act, to regulate filling, dredging, and changes of use in San Francisco Bay, and to regulate new development within 100 feet of the shoreline, to ensure that maximum feasible public access to and along the Bay is provided. As stated on page III.A-7, “In addition to regulating fill, BCDC is also charged with ensuring that the limited amount of shoreline property suitable for regional high-priority water-oriented uses (ports, water-related industry, water-oriented recreation, airports, and wildlife areas) is reserved for these purposes. The project would allow for continued and improved water-oriented recreation uses at the marina. Finally, the Bay Plan requires new waterfront projects to provide maximum feasible public access to the Bay. The proposed project would allow for continued public access to the Bay and would provide public access along the existing East Harbor breakwater where none currently exists. As a result, it appears that the project would be consistent with this requirement.”

As indicated on DEIR p. II-14, the proposed project would require a Major Permit from BCDC for all project activities, at which point the BCDC will evaluate (as stated on DEIR p. III.A-7) whether (1) the public benefits from the fill clearly exceed the public detriment from the loss of water area; (2) no upland alternative location is available for the project purpose; (3) the fill is the minimum amount necessary to achieve the purpose of the fill; and (4) the fill will minimize harmful effects to the Bay.

As stated on page III.A-10, “The project would improve the character of the area by undertaking public-access upgrades, such as ADA improvements, and a new pathway along the breakwater in the East Harbor. Moreover, the project would upgrade both the East and West Harbor restrooms, thereby enhancing these public conveniences.” Therefore, the DEIR identifies the general (i.e., non-boating) benefits of the proposed project in light of the project’s Bay fill requirements. While all users of the marina vicinity would benefit, because the project is a marina renovation project funded in part by the Department of Boating and Waterways, it is primarily intended for boaters and the improvement of boating facilities.

Socio-Economic Impacts.

CEQA Guidelines Sections 15131(a) and (b) state that economic or social effects of a project shall not be treated as significant effects on the environment. However, social and economic effects may be relevant to consider in determining whether a physical change caused by a project results in a significant environmental effect. Socio-economic impacts were not addressed directly in the DEIR

because no clear connection could be made between the project's potential economic and/or social effects and any significant physical changes in the environment. Potential socio-economic effects of the proposed project which could result in physical changes to the environment could occur from a reduction in the number smaller-size slips, potentially affecting traffic and parking near the trailered boat storage area/boat hoist in the East Harbor, as existing harbor tenants with smaller, trailerable boats may convert to put-in/take-out use. The Project Description of the DEIR (page II-11) states that, "The East Harbor parking area would be improved by renovating an existing boat hoist for boat launching and utilizing the former boat trailer storage area immediately southeast of the boat hoist. The roughly 13,600-square-foot boat trailer storage area is currently vacant because the boat hoist is non-operational, but has the capacity to hold about 24 trailered boats at one time. Once the boat hoist has been renovated, it is expected that trailered boat storage would return on a daily basis, and that some owners of the small craft currently berthed at the marina would convert to put-in/take-out use." It should be noted that smaller boats would continue to be able use the new slips at the marina, including slips that would be larger than the boats contained within them.

Page 22 of the Initial Study (DEIR Appendix A) states that, "... the renovated hoist could hold a maximum of 24 trailered boats, thereby generating up to approximately 48 new daily one way automobile trips focused primarily on this intersection as a worst-case scenario. Actual usage of this facility would likely be substantially less. The addition of 48 new daily trips to this intersection [Marina Boulevard / Beach Street / Buchanan Street], spread over various times of the day, would not be sufficient to degrade the existing LOS B (weekday PM) or LOS C (Saturday midday) to an unacceptable condition. The project effect on this intersection would be less than significant."

DEIR page V-4 further states, "If small-craft boaters arrived at the renovated boat hoist and were unable to find a parking space in the boat trailer storage area, then they would likely leave the marina and search for another boat launch site in the area, as trailered boat parking would be prohibited in other areas of the marina or the vicinity, as is the current parking policy. Given the daily fluctuation and the relatively low number of boat trips at the marina even during peak periods, it is unlikely that the number of small-craft boaters who could not find sufficient trailered boat parking under project conditions would create a substantial traffic or parking impact as they seek other put-in/take-out options in the vicinity."

DEIR page II-11 identifies the anticipated project schedule and addresses how project construction would affect existing tenants. As stated on this page, "Construction of the proposed project would take up to about 36 months (about 20 months in the West Harbor and 16 months in the East Harbor). Waterside work would be staged to limit displacement of marina tenants. The staging would involve replacing portions of the floats and pilings and performing associated dredging in sections of the marina, with marina tenants temporarily relocated during each stage. A tenant relocation plan would be developed in conjunction with project design work to minimize the number and duration of temporary relocations. It is expected that temporary locations would be provided for most tenants who choose to stay at the marina during project construction."

Therefore, due to the project phasing, duration of the construction period, and tenant relocation plan, it is not anticipated that the proposed project would displace substantial numbers of smaller

boaters, in particular such that a significant physical impact on the environment would occur, as these boaters would 1) choose to relocate to other portions of the marina once renovations are complete; 2) decide to use the renovated boat hoist in the East Harbor for put-in/take-out; or 3) seek other berthing (or put-in/take-out) opportunities elsewhere in the area. None of these activities were found to have the potential to result in a significant impact on the environment. Therefore, the DEIR appropriately excluded an evaluation of the social and economic effects of the project as no clear nexus could be established between the social and/or economic effects of the project and any significant impacts on the environment.

Impacts of (anticipated) increased percentage of power boats vs. sailboats.

As described in the Project Description of the DEIR, Table 1, Proposed Waterside Improvements, page II-9, the percentage of power boats vs. sailboats is anticipated to remain the same between existing and project conditions (37% power boat/63% sailboat). The proposed project would reduce the overall number of slips available at the marina, these slips would be, on average, 6.5 feet longer than under existing conditions, and some of the slips in the Outer West Harbor would be reoriented from north-south to east-west. However, the overall makeup of the craft type at the marina is not anticipated to change substantially, if at all, from existing conditions. Therefore, the percentage of power vs. sail boats at the marina has been estimated to remain the same under project conditions. The potential for the percentage of power vs. sail boats to result in environmental impacts under project conditions was primarily considered with regard to the air emissions calculations provided in the Air Quality section (pages 32 – 34) of the Initial Study (DEIR Appendix A), as potentially larger power boats could generate additional emissions even if the overall number of boats were reduced, and the percentage of craft type would remain the same. As stated on page 34, “emissions from the proposed project would not exceed current BAAQMD thresholds. Therefore, the marina emissions from the proposed project would be less than significant.”

The visual impacts of the percentage of power boats vs. sail boats under project conditions are described in Section III.B, Visual and Aesthetic Resources, Figures 5B and 8B, pages III.B-6 and B-11, respectively. These simulations visually portray power boats as well as sailboats in the East and West Harbors at roughly the same occurrence as would be found under existing conditions, (i.e. images of powerboats occurring about one-third as often as sailboats, similar to existing conditions), although the boats are rendered to be somewhat larger and taller to reflect the anticipated increase in the average length of slips that are assumed to correlate with larger boats. Therefore, the DEIR evaluates the potential environmental effects of the project with regard to the percentage of power boats vs. sail boats.

Impacts of Trailered Boat Storage and Circulation/Overcrowding at Entrance to Lower Ft. Mason.

The potential traffic and parking impacts of trailered boat storage are described above. Because the entrance to Lower Fort Mason (i.e. that area immediately in front of the gate house entrance) is unsignalized, the level of service (LOS) of the closest signalized intersection to the entrance (Marina Boulevard / Beach Street / Buchanan Street) was evaluated. As described above, the number of trips to the trailered boat storage area is limited to the number of daily boat hoists (24)

that could be accommodated under project conditions, resulting in a maximum of 48 new daily trips to this intersection. This number of trips, spread over various times of the day, would not degrade the existing LOS B (weekday PM) or LOS C (Saturday midday) to an unacceptable condition, which is defined in the Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review* as degradation of an intersection operating at LOS D or better to LOS E or LOS F. Therefore, the project effect on this intersection would be less than significant. Given the relative proximity of this signalized intersection to the entrance to Lower Fort Mason (about one block east), it can be reasonably concluded that the effects of the trailered boat storage area would not result in substantial impacts to circulation or overcrowding in this area as well. Finally, the peak hour volume of traffic through the entrance to Lower Fort Mason occurs during special events on weekday evenings and weekends, while the peak hour volume of traffic to and from the trailered boat area would occur primarily on Saturday middays only, generally limiting the times in which conflict/crowding would occur in this area.

As described later in this document in Section D, Staff Initiated Text Changes, the following improvement measure regarding improved directional signage in the East Harbor/Lower Fort Mason area has been added to the DEIR:

“Provide signage or other directional materials as appropriate to indicate the location of the Bay Trail alignment on the marina property, particularly in the East Harbor area. Coordinate with the San Francisco Bicycle Coalition, the National Parks Service, the Fort Mason Foundation, Bay Trail project staff, and other appropriate interested parties in efforts to improve conditions for Bay Trail users on marina property, particularly in the East Harbor area.”

COMMENT 1.7

...this is a flawed draft environmental impact report, because it does not address quality of life issues. As has been stated by a number of speakers today, that area will have added pollution. A lot of constituents from the San Francisco area go to that area for recreational purposes. They should not be visiting that area so that they be adversely impacted by the pollution. (*Francisco DeCosta, Public Hearing Transcript, October 6, 2005*)

Response 1.7

The effects of the proposed project on air quality, water quality, and potential exposure to hazardous materials (i.e., environmental pollution) are primarily addressed in the Initial Study (DEIR Appendix A), while the water quality effects and hazardous materials exposure of dredging in the East Harbor are discussed in Section III.E, Hydrology and Water Quality, and Section III.F, Hazardous Materials and Waste, respectively. These sections include mitigation measures for identified potentially significant impacts of the proposed project, which would reduce all impacts to a less-than-significant level.

2. PROJECT DESCRIPTION

The comments provided below relate primarily to the scope, objectives, or general merits of the proposed project rather than the adequacy or accuracy of the environmental evaluation provided in the DEIR. However, all public comments on the project description are welcome and have been noted by the Planning Department, with an attempt to provide additional information, and/or references to various sections of the DEIR or its supportive materials wherever possible.

COMMENT 2.1

DBW has e-mailed us that the retrofit of the existing seawalls is eligible for DBW funding but that the City has not applied for it. (*Joan Girardot, Public Hearing Transcript, October 6, 2005*)

As citizens we are urging you to recommend that the scope of the project be enlarged to include evaluation of the seismic retrofit of the Marina Boulevard and Fair's seawalls. (*Joan Girardot, Public Hearing Transcript, October 6, 2005*)

The first is to recommend that the scope of the Marina Harbor Project be expanded to include the seismic retrofit of the Marina Boulevard seawall and Fair's seawall. (*Judy Berkowitz, Public Hearing Transcript, October 6, 2005*)

I also support that the scope of this project be expanded to include the seismic retrofitting of the seawalls. (*Sue Chang, Public Hearing Transcript, October 6, 2005*)

I think, secondly, we should have a second hearing to invite Rec. and Park to discuss the issue of why aren't they included in the scope of the seawall. (*Commissioner Bill Lee, Public Hearing Transcript, October 6, 2005*)

But the surrounding seawall isn't part of that - isn't being considered for a seismic upgrade and I don't really follow why that is. I think it seems to me, that it would be beneficial to include that in the project area, to include a seismic upgrade. And so I just think it would be beneficial. I'm not sure why it wasn't included when most of the area around it is. (*Commissioner Olague, Public Hearing Transcript, January 12, 2006*)

As to an economic issue, an economic socio-economic issues are part of the EIR, it has been acknowledged by Yomi that boats and waterways does fund upland improvements and that would include something like the improvement of the seawall. Further, if the rec and park has not been able to maintain this facility in other words, they say they've got 40 years of deferred maintenance, how are they going to do it in the future. (*Ron Mulcare, Public Hearing Transcript, January 12, 2006*)

Inaccurate: "The project would be funded by a loan from DBW, which limits the scope of repairs to marina-use improvements." Accurate: Seismic repairs to the seawall would have been eligible to be considered for DBW funding if they would have been included in the original project loan application. (per Harold Flood, California Department of Boating and Waterways.) (*Sue Chang, January 19, 2006*)

Response 2.1

The commenters' opinions that the scope of the proposed project should be expanded to include the seismic retrofit of the Marina Boulevard Seawall and Fair's Seawall are noted. The existing structural and seismic information about the seawalls in the project area is addressed in Section II, Project Description, and Section III.D, Soils, Geology, and Seismicity. Page II-14 of the DEIR Project Description provides the project sponsor's rationale for why improvements to the seawalls are not included within the scope of the proposed project. This section notes, "Upgrades to the seawalls are not proposed as part of the project due to the prohibitive cost associated with structural repairs. The project would be funded by a loan from DBW, which limits the scope of repairs to marina-use improvements. In addition, two detailed geotechnical reports regarding the seawall's structural stability (Harding Lawson Associates et al., 1991; Treadwell and Rollo, 1997) considered it to be economically infeasible to address the stability of the entire marina area, and recommended that the City make repairs to the seawall, utilities, and sidewalk/jogging path behind them after a major earthquake."

While the DBW would not prohibit the expenditure of state funds on seawall repairs if such funding had been applied for and approved, the specific loan conditions for the current project do not include expenditure of state funds to make alterations to the seawalls. As such, these elements were not included in the scope of the proposed project.

As noted in the Project Description of the DEIR, the DBW loan funding the harbor improvement project would be repaid with fees paid by harbor tenants and other revenues generated in the marina. Improvements to the seawalls would not be harbor improvements that would benefit these marina users to a level commensurate with the increased fees. The City may undertake seawall improvements in the future, but could not fund them through boaters and user fees. Including seawall repair in the proposed project would increase boater fees to the extent that DBW would no longer fund the project. Therefore, the issue is not that DBW funds cannot be used but that seawall repair could not be funded through increased harbor tenant fees, and without another identified source of funds to repay the loan, DBW would no longer fund the project.

A substantial amount of information about the existing structural conditions of the seawalls is provided in Section III.D, Soils, Geology, and Seismicity. As noted in that section, the seawalls would likely move and settle in the event of a major earthquake on the San Andreas or Hayward faults. This outcome would primarily affect the Marina Green. The existing box sewer along Marina Boulevard, rather than the seawalls, provides some seismic stability for areas south of Marina Boulevard. Moreover, the existing areawide seismic risk would not be affected or worsened by the proposed project. Where additional exposure to the existing seismic risk could be caused by the proposed project, such as in the reoccupancy of the Degaussing Station (which sits partially atop the Fair's Seawall) for reuse as a Harbor Office, mitigation measures are identified to reduce this potential risk to a less-than-significant level (please see Mitigation Measure GEO-1, page IV-3).

While the scope of the proposed project may not contain certain elements that, in the opinion of many of the commenters, ought to be included in the project, the purpose of the DEIR is to evaluate the potential environmental impacts of the project as defined by the project sponsor and identify mitigation measures to reduce the significant impacts of the project to a less-than-significant level. Where the proposed project would change or worsen an existing seismic risk, such factors are fully described in the DEIR.

Please also see Section C.6, Soils, Geology, and Seismicity, and Section C.10, Alternatives, in this document, which includes further discussion of the issue of seismic upgrades to the seawall.

COMMENT 2.2

I'd also like to talk about the outer west harbor. Currently it consists of 72 berths, 92 [percent] of which are either 25 or 30 foot berths. Most of them are sailboats with a relatively low profile as you can see here. In the new project it--88% of the boats will be either 45 or 50 feet. The additional 12% will be 60 feet berths. So with the large expanse of water will (sic) be covered by 350 feet of break water and an adjacent guest dock, significantly larger boats and a significant increase in docks covering the water. The EIR should analyze accurately the number of sailboats verses power boats and how that correlates to the size of the boats. (*Sue Chang, Public Hearing Transcript, October 6, 2005*)

Issues that were raised about the difference between the large berths and the small berths, again, the environmental impact effects of these different size berths is something that is appropriate here. (*Commissioner Antonini, Public Hearing Transcript January 12, 2006*)

Why doesn't the Draft EIR include the diagram of the proposed harbor layout that includes the actual berth sizes? It is important to understand that the Outer West Harbor is going to have berths that are, on average, 20 ft longer than the existing berths in the outer west harbor. (*Sue Chang, January 19, 2006*)

Please certify, by independent agency, the current data on the power vs. sail boats --It is important for this information to be sorted by boat length and boat type (power vs sail). Please analyze if the length of the boat gives an indication as to whether the boat is more likely to be a power boat or a sail boat and whether views are likely to be significantly degraded by 55+ foot yachts berthed in an east-west orientation in the outer west harbor. (*Sue Chang, January 19, 2006*)

DEIR Table 1 pII-9 "Boat Type" states the "anticipated" ratio of sailboats to power boats under the proposed Project will be 63%/37%, the same as current conditions. This is pure conjecture by the Project Sponsor, and unsupported by any evidence. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.2

Table I, Proposed Waterside Improvements on page III-9, identifies the slip size and distribution under existing and project conditions. The table notes that the vessel mix (63% sail boat/ 37% power boat) is anticipated to remain unchanged under project conditions, and that the overall slip size would increase from approximately 32 feet to 38.5 feet, an increase of 6.5 feet, under project

conditions. The vessel mix was provided through tenant logs kept by the Harbor Master, based on existing operations at the marina. DEIR page II-7, Figure 3, *Proposed Site Plan*, identifies the proposed harbor layout, drawn to scale. Because the average slip size would increase by 6.5 feet, it was assumed in the EIR analysis that average boat size would also increase by 6.5 feet and that the boat type mix would remain the same as under existing conditions. The visual effects of potentially larger boats in the new slip configurations are provided in Section III.B, Visual and Aesthetic Resources. As described in this section, potentially larger and/or reoriented boats in a marina setting would have no significant adverse impacts to visual quality, because they would not substantially degrade or obstruct scenic views, nor substantially degrade the existing visual character of the area.

COMMENT 2.3

The second point is the project proposal objective number 3B states “provide a slip size distribution that more closely matches market demand.” I want to state categorically that the proposed project does not achieve this objective. In fact it proposes the exact opposite. (*Emeric Kalman, Public Hearing Transcript, October 6, 2005*)

More importantly the consultant’s opinion is directly contradicted by official forecasting done by the State Department of Boating and Waterways. According to their [indiscernible] assessment, dated October 15, 2002, berthing demands for boats 20 to 25 feet in length will significantly increase in the San Francisco Bay by 2020. Thank you. But demand will decrease larger boats. (*Emeric Kalman, Public Hearing Transcript, October 6, 2005*)

And their forecasts say the demand on the bay is for smaller boats going out to the year 2025. This is an official document. And it directly contradicts objective number 3 which says that we are doing on page 2-12 which says that we’re doing this project to, quote, provide a slip size distribution that more closely matches market demand. Well, rec and park has a study from their consultant, a sole source contractor rec and park that says market demand is for the larger boat. But this study says it’s for the smaller boat. (*Joan Girardot, Public Hearing Transcript, January 12, 2006*)

The proposed project does not achieve the stated project purpose. The proposed project slip size distribution with removal of 282 berths for 20, 25, and 30 foot boats contradicts the purpose of achieving “a slip size distribution that more closely matches market demand.” The official forecasting of berthing facilities needs on San Francisco Bay contained in the DBW California Boating Facilities Needs Assessment dated October 15, 2002 states that demand projections for the period 2000-2020 will go up for the smaller 20’ and 25’ boats but the demand for berths over 25’ in length will fall. Therefore, the project’s proposed slip distribution would fail to meet the projected market demand. According to these DBW forecasts, the number of berths for small boats (25’ and under) should be increased and the number of berths for boats larger than 25’ in length should be decreased. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

Why is there no practical proof (such as placed or failed ads) that tell us no market exists for 20 footers in the marina? Each marina is different so can we ‘assume’ you are assuming there is need for it or fact there is no market for 20 footers near the Golden Gate bridge? (*Will LeRoy, undated*)

The sponsor’s objectives are based on faulty data, giving rise to unnecessary construction. Among the sponsor’s objectives listed on page II-12 of the DEIR is:

“Provide a slip-size distribution that more closely matches market demand.”

This is expanded on page II-13 to cite a 2002 study by Moffatt & Nichol that alleges that there is:

“a recent shift toward the ownership of larger boats”, and that

“approximately 85 % of the more than 500 boaters on the marina waiting list desire slips greater than 30 feet in length”.

Neither of those statements turns out to be correct, but the objective which they are claimed to support results in a significant re-configuration of the harbor and a significant increase of the cost of the project. There are more objective sources of data concerning the berth size distribution and demand that show quite different results. (*Alan Silverman, Marina Community Association, January 18, 2006*)

Stepping the mast for a 25 foot boat is usually done by professionals using a crane. Thus, most small sailboat sailors will rarely use the hoist and will instead have to travel great distances in congestion to an alternate marina or stop sailing. This is a very large access impact which can be mitigated. (*Howard Strassner, Sierra Club San Francisco Group, January 17, 2006*)

The proposed Project calls for removal of Harbor structures, including all docks, fingers, piles, gates, gangways, and moles and construction of all new elements with a different layout and a different berth size distribution (elimination of berths for small boats and significant increase in number of berths for large yachts). Project Sponsor asserts that the rationale for this wholesale demolition and new construction including expansion of the footprint and additional Bay fill is its consultant’s report on market demand for berths on San Francisco Bay. That report concludes that future market demand is for berths for larger boats and that there is weak demand for berths for smaller boats. The consultant’s forecasts, however, are directly contradicted by the official forecasting of market demand on San Francisco Bay by the State of California Department of Boating & Waterways. In its “California Boating Facilities Needs Assessment, Forecasts of Boating Activity & Facilities Needs, Oct. 15, 2002” DBW forecasts the exact opposite. Demand for berths under 25 feet will increase and demand for berths over 25 feet will decrease. Thus the proposed Project fails to achieve Objective #3: “Provide a slip size distribution that more closely matches market demand.” It should be noted that many nearby harbors have expansion plans – Treasure Island, South Beach, Sausalito, Cruise Ship Terminal, Piers 27-31, etc. The DEIR should include comments on total SF Bay market demand. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.3

The market study for the project was prepared independently by Williams Kuebelbeck & Associates (WK&A), a firm specializing in the analysis of boating markets and boating facility financial feasibility (WK&A, 2002). The proposed slip size distribution was developed based on contemporary market demand at the project site, determined in part by the desires of those on the marina waiting list, and on a desire to improve operating economics. As summarized from the WK&A study, and reiterated in the San Francisco Marina Renovation Study (Moffatt & Nichol, 2002) and again in the DEIR, “approximately 85 percent of the roughly 500 boaters on the marina waiting list desire slips 30 feet or longer.There is a strong market demand for a different mix of slip sizes than is currently available at the marina, one that would accommodate the recent shift toward the ownership of larger boats, both sail and power, for both existing and future tenants and visitors.”

The WK&A study also recognized that smaller boats can be stored on dry land (dry storage), trailered to the site, and placed in the water using the launch facility at the marina. As such, renovations to the boat hoist in the East Harbor were proposed as part of the project in order to provide options for smaller boats. In order to adapt to the changing vessel sizes at the marina, and recognizing the physical constraints of the harbors, a reduction in the total number of slips was also included in the project.

The market study, though based on actual demand at the marina, also reflects the findings and projections of the *California Boating Facilities Needs Assessment, Forecasts of Boating Activity & Facilities Needs*, (DBW, 2002) which the comments appear to reference. The DBW study forecasts an increase in demand for boats of all sizes in California, including the San Francisco Bay and Sacramento/San Joaquin Delta region, and notes that most of that growth will be in the number of boats 25 feet or less, with the further qualification that the greatest increase will be in boats 16 feet or less. The DBW study distinguishes between the demand for dry storage and launching for these smaller boats, and demand for wet storage at marina slips. DBW forecasts indicate a strong demand for increased *launching capacity*, but that the demand for *slip capacity* will only see modest increases.

The study shows that the increasing demand for smaller boats is associated with a growing demand for dry storage and launching capacity. Because smaller boats are trailerable, they can be stored at one's private property or at a dry storage facility, and towed to a marina's boat hoist or boat ramp by truck or SUV without having to lease a slip. A far smaller percentage of the projected increase in demand for smaller boats is associated with demand for slips at a marina, or *wet storage*. As noted above, the proposed renovation and reuse of the marina's boat hoist in the East Harbor would meet some of the anticipated demand for smaller, trailerable boats, while larger slips in the harbors would meet some of the anticipated demand for larger boats, generally in keeping with the forecasts for statewide boating demands and the marina's waiting list.

The DEIR appropriately evaluates the physical effects these changes would have on the environment in Section III, Environmental Setting and Impacts. The DEIR concludes that changes

to the slip size, the number of slips, and the overall distribution of the slips would have no significant impact on the environment.

COMMENT 2.4

I am extremely troubled by this EIR and part of the reason I'm troubled by it is – I honestly can't remember any other EIRs — I think Home Depot, I can think of Golden Gate Park Concourse – there was always a design that was included as a part of it. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

[Do not]...allow this Draft EIR to proceed to the FEIR stage until final design for all the components is complete. (*Joan Girardot, Public Hearing Transcript, January 12, 2006*)

And I can say succinctly that we would like to say the Draft EIR remain a draft until some specifics, many specifics are addressed. (*Suzanne Lifson, Public Hearing Transcript, January 12, 2006*)

I'll summarize by saying the EIR itself continually says they are going to study in the future and report in the future and design in the future and construct in the future. (*Ron Mulcare, Public Hearing Transcript, January 12, 2006*)

While acknowledging the project will cause impacts, the report simply sloughs these serious impacts off by saying they will be addressed during design or construction or by future studies. (*Ronald J. Mulcare and Edward J. Barrett, September 27, 2005*)

A description of the exact placement, shape and dimensions of the new West Harbor breakwaters is not stated in the DEIR. It is stated that “the proposed breakwaters are in the design stages.” p.II-6 (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Please explain why final design or detailed design is not required from the Project Sponsor prior to environmental evaluation under the CEQA EIR process. Please describe in technical terms what level of design of these breakwaters is required by CEQA for the environmental review of this Project to be adequate. Please specify to what extent quantifications in final design for any and all Project components can differ or deviate from quantifications stated in the EIR document. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.4

CEQA Guidelines Section 15004(b) stated that an EIR “should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.” The design of the project analyzed in the Draft EIR is sufficiently detailed to enable the EIR to provide such “meaningful information” regarding project impacts, yet the design is not so far advanced that the findings of the EIR cannot “influence project program and design”; this is, in fact, the very purpose of the mitigation measures identified in the DEIR to reduce or eliminate the project's potentially significant impacts. The Guidelines further state that, in the case of public projects, “at

the earliest feasible time, project sponsors shall incorporate environmental considerations into project conceptualization, design, and planning” (Sec. 15004(b)(1)). It would not be possible to incorporate such considerations if the project design were final prior to preparation of the EIR. As such, the DEIR appropriately evaluates the project as proposed, at the appropriate point in project design.

In order to fully address the potential impacts of the proposed project, the DEIR analyzes the “worst case scenario,” or the project design that would have the greatest level of impact, for issues on which design decisions have not been finalized. In some cases, the DEIR identifies mitigation measures that would entail further analysis of project components as project designs evolve, to ensure that the project would meet specified performance standards (e.g., consistency with the Secretary of the Interior’s Standards, compliance with accepted professional standards for seismic design, appropriate disposal of dredged material, and protection of worker health and safety) and thereby reduce impacts to a less-than-significant level. See Section IV, Mitigation and Improvement Measures, specifically measures HIST-1-2, GEO-1, -3, and -4, and HAZ-1, and -2).

Design components of the West Harbor breakwaters that have yet to be finalized include the exact attachment method of the southernmost breakwater to the Fair’s Seawall and the materials for the breakwaters (rock or sheetpile). The final construction materials and exact methods of attachment to existing features are not critical to the CEQA analysis, whereas their general location and dimensions are, for purposes of hydrological, geological, and visual analysis. Since the general location and dimensions of the West Harbor breakwaters are known, as shown in Figure 3 and Table 1 in the Project Description of the DEIR, these components were evaluated for their potential hydrological, geological, and visual effects in Section 3 of the EIR (Environmental Setting and Impacts). Therefore, the DEIR adequately evaluated the potential environmental effects of the proposed West Harbor breakwaters.

COMMENT 2.5

I don’t understand why you need to build a new 1000 square foot maintenance facility on what’s designated open space and abandon a 1500 square foot building to do so. There is no rationale to the need for doing that. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

...the EIR, it says specifically with the construction of the new maintenance building, for material storage, the Department of Recreation and Park would no longer use the 1500 square foot SFPUC pump station and it would remain unoccupied. (*Alan Silverman, Public Hearing Transcript, January 12, 2006*)

And just like the bathrooms, I’m sure the city can come up with a memorandum of understanding with the P.U.C. to continue that maintenance building where it is. (*Gloria Fontanello, Public Hearing Transcript, January 12, 2006*)

The proposed maintenance building on the East Harbor open space does not further any of the Project Sponsor’s Objectives. (*Michael Spiegel, September 27, 2005*)

No mention is made, directly or indirectly, of the need for a new maintenance building to replace the larger more accessible facility at the SFPUC Pump Station now being used. The Draft EIR at S-3 states: “With the construction of the new maintenance building for material storage, the Department of Recreation and Park would no longer use the existing 1500-square foot SFPUC pump station in the West Harbor, which would remain unoccupied.” Table 2 on II-10 confirms this. How building a 1000-square foot structure in the middle of a grass open space so that an existing 1500-square foot space can become and remain unoccupied defies understanding. No objective of the project is advanced by this obvious waste of taxpayer’s money (*Michael Spiegel, September 27, 2005*)

A public restroom for the Marina Green is needed but not at the entrance to the Harbor. Perhaps the DeGaussing Station could be used for Public Restrooms and located at a screened site. To the West of its present location. Maintain the existing PUC Building as a maintenance facility and arrange the transfer to Park and Recreation. (*Nathaniel Berkowitz, October 18, 2005*)

Construction of a New Maintenance Building: I oppose this new building as unnecessary. The harbor now has use of a maintenance building that is owned by the PUC. The PUC has not indicated an intention of evicting the harbor from this building. (*Bruce Munro, January 16, 2006*)

Why should the City spend public money to build a maintenance building, when the building it currently uses for the purpose is 50% larger, located just as conveniently, and will be left vacant if the new building is erected? Why should the City build a maintenance building that will obscure views of the Bay, make good park space unusable, and create danger for children when the building it currently uses for the purpose is 50% larger, located just as conveniently, and will be left vacant if the new building is erected? Why should the City build a maintenance building when the existing SFPUC building has easy access from Yacht Road and would not require vehicles to drive on what is currently open, park space? (*Alan Silverman, Marina Community Association, January 18, 2006*)

Response 2.5

The commenters’ opinions regarding the project sponsor’s requirements for a new maintenance building are noted. The environmental effects of the proposed maintenance building are described in DEIR Section III, Environmental Setting and Impacts, specifically in Section III.A, Land Use, Plans and Policies and Section III.B, Visual and Aesthetic Resources. Please also see page III-13 of the Project Description for additional information about the project sponsor’s rationale for the inclusion of the maintenance facility in the project description. This section states, “The Department of Recreation and Park would construct a new maintenance facility to replace the current maintenance facility, which is in a structure owned by the San Francisco Public Utilities Commission (SFPUC), which has expressed the desire to close this facility. The new maintenance building would be located at the East Harbor to be more centrally located, and for its adjacency with other structures in the area (the East Harbor restrooms).”

The Department of Recreation and Park intends to negotiate with the PUC for continued use of the existing PUC pump station building. PUC staff has advised the Department of Recreation and Park that PUC may wish to close or reuse the building in the future and, therefore, the Department

should not plan on using this building indefinitely. As negotiations with the PUC for continued use of the building may not result in a permanent solution for the Department's maintenance needs at the marina, the proposed project includes a new maintenance building to be constructed in the East Harbor, and the potential environmental impacts of such a facility were evaluated as part of the DEIR.

COMMENT 2.6

And I certainly don't understand the rationale when the EIR clearly states that there will be no increase in traffic of users on the facility why we need to take away designated open space to put in toilets and showers for a group of people that are never going to show up according to their own EIR.

(Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005)

Has a thorough survey of boater needs been conducted? Have the boaters been asked if they would be more likely to use public showers or the showers on their boats? *(Sue Chang, January 19, 2006)*

A 600 sq. ft addition to the existing 1,970 sq. ft. restroom facilities in the East Harbor represents a 30% increase in the size of the building. While ADA Compliance is extremely important, providing showers and private restrooms for boaters on Public Open Space is not. The need for the bathroom expansion beyond ADA compliance has not been established. *(Sue Chang, January 19, 2006)*

Response 2.6

The purpose of the East Harbor restroom component of the proposed project is twofold: to bring the restrooms into compliance with ADA requirements, and to make restroom facilities more convenient to guest boaters in East Harbor, thereby improving water quality by reducing use of holding tanks on vessels when they are in the harbor. As stated on page III-13 of the Project Description, *Proposed Changes to the Degaussing Station, Maintenance Facility, and Restrooms*, "The East Harbor restrooms would be expanded and/or renovated for ADA compliance. They are intended for the use of boaters only, similar to the West Harbor restrooms and showers. By providing bathroom and shower facilities, the marina would be able to accommodate guest boaters in the East Harbor (guest boaters are currently accommodated in the West Harbor only). Guest and permanent boaters would then be more inclined to use landside showers and toilets, and less inclined to use their on-board toilets and showers, which would reduce accidental spills and/or overflows from the holding tanks of vessels. These measures would improve water quality in the East Harbor. Public restrooms would be open during park hours (6 a.m. to 10 p.m.), as they are currently. Boaters-only restrooms could be accessed with a key at any time, as they are currently."

Page V-2 of the DEIR, *Growth-Inducing Impacts*, states that project improvements, including restroom improvements, could attract additional visitors to the marina, but that the increased visitation is not anticipated to be substantial such that significant on- or off-site impacts to the environment would occur.

The project is a renovation of, and improvements to, an existing marina facility that includes some landside areas. Although the maintenance facility would be located in an area that is currently open

space, the Department of Recreation and Park would construct a facility on land that it manages for a range of uses, including, but not strictly limited to, open space.

COMMENT 2.7

The project description is incomplete and inaccurate. It fails to state that 3,335 linear feet of docks will be added and the project deletes 282 berths for small boats. (*Joan Girardot, Public Hearing Transcript, January 12, 2006*)

The project description is technically inaccurate and it is misleading. According to the Department of Building Inspection the term “renovation” is a technically meaningless term and can mean almost anything the applicant defines it to mean. The term does not appear in any of the City’s codes. Technically, the actual project is a demolition (removal) and new construction project: removal of all existing in-water berthing facilities including all piles, docks, fingers, gates, gangways, utilities, etc and replacement construction of all the aforesaid, constructed of different material and with a different berth size distribution and layout. The project description is further inaccurate because it omits the vital information that the project is an expansion of Harbor facilities. The project adds 3,335 linear feet of docks in addition to the replacement of 21,280 linear feet of existing docks (Moffatt & Nichol 1997), for a total linear footage of 24,615 LF. This addition of 3,335 LF represents a length greater than 11 football fields and represents a significant increase in Bay fill over existing conditions. The project description is further inaccurate because it omits the vital information that the construction and the placement of the proposed Outer West Harbor breakwaters will enclose over 150,000 square feet of surface water area, which is now open water, and that the placement of the additional Outer West Harbor berths will encroach over 375 feet eastward from the existing easternmost berth along the Fair’s Seawall. This represents a significant expansion of the Harbor along the public shoreline. It greatly expands the footprint of the Harbor. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

The Project Description listed on the official Public Notices is incomplete. It fails to disclose key Project components. Please amend the Description by adding disclosure that the Project eliminates 282 existing berths for small boats; adds 3335 linear feet of docks over existing conditions; expands the footprint of the harbor eastward along the Fair’s Seawall; and encloses surface water area in the West Harbor Outer Basin. The Project Description is inaccurate. It describes the Project as a “renovation.” This is a nontechnical term and not found in any City code. It is therefore meaningless. Characteristics of the Project which do have technical meaning are: demolition; new construction; and expansion (of harbor footprint and facilities). (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.7

Table 1, Proposed Waterside Improvements, page II-9 of the DEIR summarizes the project description. The table identifies “Estimated net increase in floating docks: 3,335 linear feet.” The increase in linear feet would primarily occur as a result of extending the average length of slips by

6.5 feet throughout the entire marina, and is not intended to be expressed or interpreted as one linear dock or other project feature that is 3,335 feet in total length.

Table 1 of the DEIR also accurately indicates the slip size distribution, expressed by slip length and percentage of the whole, that would occur under existing and project conditions. As stated in Table 1 under the heading “Slip Size,” the number of slips 25 feet and under (i.e. slips in which boats 25 feet or less may berth) would be reduced from 255 under existing conditions to 16 under project conditions, for a reduction of 239 slips of this size. Regardless of the fact that this number (239) is somewhat less than the number described in the comment (282), the potential physical environmental effects of slip size redistribution is evaluated in Section III, Environmental Setting and Impacts in the DEIR where appropriate.

All project components are described in the Project Description. The term “renovate” is used in the common sense of the word, meaning “to restore to a former better state.”⁵

Public notices are intended to inform the public of an impending action by a city decision-making body, or the availability of a detailed report, such as a draft EIR. Project descriptions provided in public notices are intended to be a brief summary of the proposed project, and do not include a description of every project component in detail. The project description provided in the public notices for the proposed project was meant to be sufficiently detailed to inform the public about public hearings and the availability of the DEIR.

COMMENT 2.8

The StFYC [St. Francis Yacht Club] is also one of the largest employers in the Marina District and contributes to the City and Marina area in many significant ways. I believe the operation and function of the StFYC will be adversely affected during the construction of this project, as portions of the Marina are rendered temporarily inoperable. There is no mention of this impact on the Club. The shortcoming outlined above will be somewhat temporary, however. The real permanent and very adverse affect the Project has on the Club is to be found in the future plan for the distribution of new slips (on page 183). In this plan the existing turning basin is radically reduced by the extension of the middle row of slips. This will make the safe and navigable operation of large guest vessels and regatta fleets (the lifeblood of the StFYC) difficult or impossible. Plainly stated, the existing amount of turning radius **MUST** be preserved in the future plan in order to allow for normal and typical vessel traffic to occur in the future. (*Richard H. Robinson, September 6, 2005*)

Response 2.8

The commenter later withdrew his written comments during the public hearing on January 12, 2006, by stating the following, “Back in October I had written a letter expressing some concern over the reduction in the turning basin radius as a result of the extension of additional slips. I have since met with the harbor master, understand the scope of the project a little bit better now. I do not

⁵ Webster online dictionary: www.m-w.com/dictionary.

believe that there will be any negative impact on the sailing operation or people coming in and out of the harbor. So I wish to withdraw my letter as an objection at all.”

For informational purposes, however, operational and construction-related effects to the St. Francis Yacht Club are primarily discussed in Section III.B, Land Use, Plans, and Policies. Page III-9 states that, “the project would not disrupt or divide the physical arrangement of the Marina Green, nor adversely affect ongoing recreational uses at either the St. Francis or Golden Gate Yacht Clubs.” Page III.A-9 further states, that, “While the proposed project would make changes to site development, it would not disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any businesses, residences, or other uses. Although existing boat tenants could be temporarily relocated during construction, they would not be permanently displaced by the project, as they would have the opportunity to return once renovations are complete.”

COMMENT 2.9

Resolved that the Executive Committee of the Coalition for San Francisco Neighborhoods urges the Planning Commission to recommend to the Department of Recreation and Park to retain all 282 berths for small boats at the Marina Harbor. (*Judith Berkowitz, letter, October 2, 2005*)

The second resolution urges the Planning Commission to recommend to the Department of Recreation and Park to retain all 282 berths for small boats at the Marina Harbor. (*Judy Berkowitz, Public Hearing Transcript, October 6, 2005*)

Response 2.9

The commenter’s request for the retention of smaller slips is noted. The physical environmental effects of the proposed change in slip size and distribution at the marina are evaluated in Section III, Environmental Impacts and Setting, as well as Appendix A, Initial Study, of the DEIR.

COMMENT 2.10

1. Relocate the Wave Organ: Moving the wave organ jetty from a North Easterly to a South Easterly orientation. Changing the Wave Organ Jetty will reduce the sedimentation within the Harbor and will eliminate the need for building a new Breakwater to the North. A breakwater from the South may not be required or it may be a less obtrusive structure.

2. Extend the West Basin to the existing Western Harbor Wall i.e., move the North-South float approximately one hundred feet to the West. Utilizing the West portion of the basin will allow more berths along both sides and providing greater turning water at the “head of the harbor”.

3. Coordinate with GGNRA the Crissy Field Marsh & Wetland Project and extend their lagoon system with canals that would connect to the Western portion of the Marina. This would improve the flushing rates of water in the West end of the basin. If connecting to Crissy Field Lagoons is not available then an

exit channel/tunnel should be constructed. The poor flushing within the West Basin must be improved. (*Nathaniel Berkowitz, October 18, 2005*)

Response 2.10

The commenter's requested changes to the scope of the proposed project are noted. For informational purposes, no relocation of, or changes to, the Wave Organ have been considered at this time, either as part of the project or under any of the identified project alternatives. The need for new breakwaters is described on page II-12, item #2, under Project Sponsor's Objectives, to "protect marina structures from locally generated wind-waves from the north and northeast directions." The project's potential effects on the Wave Organ are described in Section III.A, Land Use, Plans, and Policies as well as Section III.C, Historic Resources. Off-site sedimentation and erosion effects on Crissy Field are described in Section III.D, Soils, Geology, and Seismicity. Flushing and sedimentation rates in the West Harbor are described on page 49 of the Initial Study, DEIR Appendix A.

COMMENT 2.11

The historic lighthouse that once marked the entrance to the Harbor should be relocated to the new entrance (further to the East) and hopefully on the relocated spit (see item 1.) (*Nathaniel Berkowitz, October 18, 2005*)

Response 2.11

The commenter's requested changes to the scope of the proposed project are noted. No relocation of the lighthouse is considered at this time. For informational purposes, the project's potential effects on the historic lighthouse are described in Section III.C, Historic Resources. As stated in this section, the proposed project would have no adverse effects on the historic significance of this facility.

COMMENT 2.12

Public docks and pump-out sewage station should be maintained and be accessible. (*Nathaniel Berkowitz, October 18, 2005*)

Response 2.12

The commenter's requested changes to the scope of the proposed project, including retention of the public docks and existing pump-outs are noted. The physical environmental effects of the proposed publicly-accessible guest docks as well as the new and renovated sewage pumpout stations, are evaluated in Section III., Environmental Setting and Impacts.

COMMENT 2.13

The distribution of berths seems appropriate and it must be recognized that the existing harbor was built “too small” and was controversial at that time. Perpetuating that distribution would be in error. However, the West Harbor is and should be principally sailboats and the ability to sail into the Harbor must be preserved. (*Nathaniel Berkowitz, October 18, 2005*)

Response 2.13

Comment noted. No change to the existing 63% sailboat / 37% power boat mix is anticipated as a result of the proposed project.

COMMENT 2.14

Why is there no plan for a lottery for the added larger berths and where in; allowances or preference made for those who would lose or see degraded their existing berths? Current list was for existing berths while berth holders could not for see being forced out. (*Will LeRoy, undated*)

Why Not A Lottery. I feel strongly those displaced should receive a fair chance at a new berth. There is mention that a line exists already to get the new berths but that is hardly fair. That list was for berths currently on line as people willingly left. In the spirit of fairness and to avoid even the appearance of favoritism [sic] there should be a lottery since this is a recreation area. This is an accepted practice in many harbors on the west coast. (*Will LeRoy, undated*)

Response 2.14

The commenter’s requested changes to the scope of the proposed project, including the use of a lottery for the renovated slips, are noted. For informational purposes, existing tenants at the marina would have the opportunity to remain at the marina once renovations are complete. Existing tenants would have priority to remain at the marina over those on the waiting list. Each existing tenant who does not wish to return would provide an available space for those on the marina’s waiting list. The list is maintained by the harbor office for a fee and on a first-come, first-served basis (i.e., those who have been on the waiting list longer than others would be given priority to relocate to the renovated marina as space becomes available).

COMMENT 2.15

Why is planned entrance of West harbor not as other parts of harbor such as stone or granite, something with same character as exists now. Does this plan seek to change environmental quality? (*Will LeRoy, undated*)

Response 2.15

The commenter’s requested changes to the proposed project, including the materials to be used on the West Harbor breakwaters, are noted. The DEIR Project Description, page II-6, states that “two rock-filled or sheetpile breakwaters would be constructed in the outer basin of the West Harbor, and

a floating, pile-supported breakwater would be constructed in the East Harbor.” The environmental effects of the breakwaters are evaluated in Section III, Environmental Setting and Impacts. The visual character of the proposed breakwaters is addressed specifically in Section III.B, Visual and Aesthetic Resources. The difference in the visual effects of rock-type and sheetpile-type breakwaters is discussed in this section. No significant, adverse visual impacts of the breakwaters of either type were identified in the visual analysis.

COMMENT 2.16

What is the cost of creating a dock that can withstand the massive tons of the mega yachts compared to the small little sail boats this plan would see removed. (*Will LeRoy, undated*)

Response 2.16

The commenter’s opinion regarding the costs of the project is noted. As stated in DEIR page II-12, “In November 2004, the DBW approved a loan of \$16,500,000 to finance proposed renovations to the West Harbor alone. The costs associated with the proposed renovation of the East Harbor would be approximately \$19,500,000. These additional project costs for renovations to the East Harbor would be funded primarily through additional loans from the DBW, although several other funding mechanisms may be used.” The expected change in boat sizes is discussed in Section III.C, Visual and Aesthetic Resources. As described in this section, no significant visual impacts related to potentially larger boats at the marina were identified.

COMMENT 2.17

Please designate on map where the loading and unloading of boats will occur as proposed, ‘hand boat ramp’ with added parking in same area. (*Will LeRoy, undated*)

Response 2.17

Figure 3, *Proposed Site Plan*, on DEIR page II-7, identifies the area of the renovated boat hoist and boat trailer storage area (items #8 and #9 on the figure), and the public hand boat launches and guest docks (item #7 on the figure) shown in both the East and West Harbors.

COMMENT 2.18

The boundaries of the project were incorrectly set, ignoring impacts on adjacent parcels. (*Alan Silverman, Marina Community Association, January 18, 2006*)

Thus the boundaries of the project, as defined by the DEIR itself, clearly include the sea walls, the St. Francis Spit and the Marina Green. Two of the three proposed new breakwaters would attach to the St. Francis Spit and the Fair Sea Wall. Access to the proposed new Harbor Master’s office could only be attained by use of the Marina Green. (*Alan Silverman, Marina Community Association, January 18, 2006*)

To exclude the sea walls, the St. Francis Spit and the Marina Green from the project scope makes no logical or economic sense, and is a violation of CEQA. (*Alan Silverman, Marina Community Association, January 18, 2006*)

Response 2.18

The commenter's opinion regarding the project site boundaries is noted. The seawalls, the St. Francis Spit, and the Marina Green are not included in the project boundaries as no changes to them would occur as part of the project. Regardless, the proposed project's potential effects on adjacent, off-site structures and uses, including the seawalls, the St. Francis Spit, and the Marina Green, are addressed in Section III, Environmental Setting and Impacts. While there is the potential for off-site impacts to occur as a result of a proposed project, no significant off-site impacts from the marina renovation project were identified in the DEIR.

COMMENT 2.19

By drawing project boundaries only around the East and West Harbors, with a tiny boundary box around the Former Degaussing Station in between, the Draft EIR is deficient because it fragments a linear recreation route that runs through all of the Project. (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

Response 2.19

Figure 3, *Project Site Plan*, on page II-7 of the DEIR graphically illustrates the project area as a dashed line, to define the limits of construction of the proposed project, which are generally confined to the East and West Harbors of the marina and exclude the Marina Green. One project component that is located near the Marina Green is the Degaussing Station, proposed for reuse as a Harbor Office. A dashed line is shown around this building indicating that it too would be within the project area boundaries. Although most of the construction work would be on the interior of this building, a smaller project area boundary would not have been readable at the figure scale provided. Therefore, a somewhat larger project area 'box' was drawn around this building. As noted on item #12 on Figure 3, "Project area around building is shown larger for illustrative purposes."

COMMENT 2.20

We made several comments throughout the planning process regarding the need to improve circulation around the project area. Parking and automobile, pedestrian, and bicycle circulation through this heavily used area are confusing. Clear, safe, marked routes are needed for pedestrians and cyclists. We understand that these issues are not currently part of the project; however, we request you reconsider addressing these issues. This project provides an excellent opportunity to comprehensively address access in and around the marina. We request these actions be included into the project:

- Safety improvements to the circulation of bicyclists and pedestrians
- Widening the trail and Marina/Laguna intersection in order to create a safe and sensible multi-use connection through the marina parking lot across the entrance to Lower Fort Mason and linking the

San Francisco Bay Trail between the marina parking area and the Fort Mason Bay Trail segment. This would assist in moving visitors away from Marina Boulevard to the waterfront pathway.

- Improving the San Francisco Bay Trail alignment through the harbor area, parking areas, and automobile setbacks.
- Officially designate the pedestrian pathway along Marina Blvd as a multi-use trail.
- Coordinate access and circulation improvements in and around the marina with the GGNRA, San Francisco Bay Trail staff, bicycle rental companies, and other hiking and biking organizations.
- Consider widening the landscape strip along the edge of the harbor to create a better buffer between cars and pedestrians.

(Brian O'Neill, U.S. Department of the Interior, January 19, 2006)

Response 2.20

All of the proposed suggestions for traffic and pedestrian circulation improvements at the marina are noted. Implementation of the proposed project would not preclude such improvements from occurring in the future. Potential traffic, circulation and parking impacts associated with proposed project are addressed in the Initial Study (see DEIR Appendix A), as well as on page V-3 of the DEIR. As described in these sections, no significant traffic impacts associated with the proposed project, which would necessitate the measures described in the comment, were identified. Based on the comments received, however, it was determined that, due to increased activity in the East Harbor area from the proposed boat hoist, improved signage and increased coordination in trail planning would be beneficial, and an improvement measure has been added to this effect. Please also see Response #9.1 (page C&R-108) of this document, which responds to the comments received about compatibility of the proposed project with the Bay Trail and other circulation concerns.

As described in this document in Section D, Staff Initiated Text Changes, the following improvement measure regarding improved directional signage in the East Harbor/Lower Fort Mason area has been added to the DEIR:

“Provide signage or other directional materials as appropriate to indicate the location of the Bay Trail alignment on the marina property, particularly in the East Harbor area. Coordinate with the San Francisco Bicycle Coalition, the National Parks Service, the Fort Mason Foundation, Bay Trail project staff, and other appropriate interested parties in efforts to improve conditions for Bay Trail users on marina property, particularly in the East Harbor area.”

COMMENT 2.21

In the Project Setting section, the DEIR describes the San Francisco Marina (the marina) as follows: “The marina consists of two harbors: the West Harbor and the East Harbor, also known as Gashouse Cove.” This description is repeated on p.II-1 and is inconsistent with that of The SF Marina Renovation Feasibility Study – December, 2002, p.1, which acknowledges the importance of the park setting of the

marina and states “The Marina Green, a part of the marina and a major city park, is situated between the East and West Harbors.” (*Sue Chang, January 19, 2006*)

Response 2.21

Both the DEIR and the 2002 Moffatt & Nichols Feasibility Study identify the Marina Green as an important resource in the project area. The DEIR, as appropriate, evaluated the potential impacts of the proposed project on the Marina Green and concluded that the project would have no significant adverse impacts on the use or enjoyment of this public park. The project description provided in the DEIR should be considered a refinement of the description of the project area provided by in the 2002 feasibility study by Moffatt & Nichol.

COMMENT 2.22

Are the gangways included in the total square footage of the landside or waterside improvements? The Marina Renovation Project Plan is inadequate because it excludes the Marina Green, the pedestrian promenade, the parking lots and the biking trail by stating that “The Marina Green . . . is just outside of the project boundaries.” (DEIR pS-3) Because of this exclusion, certain elements and objectives of the Planning Code that should be considered in this DEIR are not reviewed. (*Sue Chang, January 19, 2006*)

Response 2.22

The gangways are included in the total square footage of the waterside improvements. The proposed project would reduce the number of existing gangways by about half. For example the number of gangways in the inner basin of the West Harbor would be reduced from seven to three under project conditions.

The Marina Green is outside of the project area boundary as no alterations to this area are included in the proposed project. Regardless, potential effects to the Marina Green were evaluated in the DEIR.

COMMENT 2.23

Why were the improvements to the pedestrian and bike path allowed to be deleted from the project after the Recreation and Park Commission had approved the conceptual project? (*Sue Chang, January 19, 2006*)

Response 2.23

Although originally included in the scope of the project in 2003, improvements to the pedestrian and bike path were removed from the proposed project in 2004 due to restrictions in the types of improvements being financed through the DBW. The DBW loan would be funded through boater fees and would therefore be limited to use for harbor improvements, such as replacement slips and docks and new breakwaters, in order to avoid undue increases in the boaters fees needed to repay the loan.

COMMENT 2.24

For a more accurate description and for more complete analysis, why didn't project sponsor state that 100 percent of the berths in the outer west harbor would be realigned from a north-south orientation to an east-west orientation? (*Sue Chang, January 19, 2006*)

Response 2.24

The DEIR accurately identifies the proportion of slips that will be realigned in the West Harbor. Page II-6 of the Project Description states, "...about 40 percent of the slips in the West Harbor would be realigned from a north-south orientation to an east-west orientation to face the prevailing winds for safer maneuvering. All new berths in the East Harbor would maintain their existing north-south orientation." Figure 3 depicts the proposed retention of slips, showing the east-west orientation of the slips primarily in the Outer West Harbor. The DEIR evaluates the environmental impacts associated with reorientation, specifically, Section III.B, Visual and Aesthetic Resources. As noted in this section, "This slip orientation would occur in the outer basin and in a small section of the inner basin and would provide views of the broadside of some boats, as opposed to views of the narrower bows or sterns, as shown in Figure 8B. This reconfiguration of slips would not substantially degrade or obstruct any scenic view, nor significantly alter the existing maritime character of the marina."

COMMENT 2.25

Why does the table use the word refurbish, when the proposed plan is clearly not refurbishing the guest dock because the existing guest dock is going to be eliminated and the new guest dock will be twice the length and in a different location? (*Sue Chang, January 19, 2006*)

Response 2.25

The comment refers to page II-8, Table 1, *Proposed Waterside Improvements*, which states, "Refurbish guest dock and add a hand boat launch" under the project improvements column. The term 'refurbishment' is meant to indicate that the existing guest dock would be replaced with a new guest dock, albeit in a different location and of a different size. Please see Section D, Staff Initiated Text Changes in this document with revisions to this language for clarification purposes. Regardless of which terms are used to describe the proposed guest dock, the physical environmental effects of this project component are addressed in the DEIR.

COMMENT 2.26

When referring to increases in the size of the boats in the harbor following the renovation, the DEIR uses terms such as "could result in," "on average" and "could attract". (*Sue Chang, January 19, 2006*)

Response 2.26

The use of the words 'could' or 'would' is common and appropriate in EIR language, because the proposed project has not been approved nor is project implementation a foregone conclusion. In

addition, although the DEIR makes reasonable assumptions about future boat size, the specific dimensions of the boats that might use the marina in the future are not known with certainty.

COMMENT 2.27

Inaccurate: “Approximately 85 percent of the more than 500 boaters on the marina waiting list desire slips greater than 30 feet in length. Accurate: SF Marina Renovation Feasibility Study p. 9 “85 percent of this waitlist are for slips 30 feet and longer.” (not greater than 30 ft) The current demand in the harbor (available slips in each berth size plus wait list applicants in each berth size) is the greatest for the 25 and 30 ft berths. 226 of the berths in the greatest demand will be eliminated under the proposed plan. (*Sue Chang, January 19, 2006*)

Response 2.27

Section D (page C&R-155), Staff Initiated Text Changes of this document, provides the following revised text to clarify the reference provided in the Project Description.

“Approximately 85 percent of the ~~more than 500~~ 498 boaters on the marina waiting list ~~in~~ desire slips ~~greater than 30 feet~~ or longer in length.”

Also, see Response 2.3 for a discussion of existing and projected demand for berths of various sizes.

COMMENT 2.28

The DEIR has not explained how the phasing affects the project. Currently, the DBW has only approved funding for Phase 1, the West Harbor which will be renovated according to the proposed plan. While the overall number of berths in the West Harbor will be decreased by only 1 berth, (from 326 to 325 total berths), 113 berths 30 ft and smaller will be eliminated in favor of berths of 35 ft and larger. (DBW SF Marina West Harbor Loan Summary p.4 San Francisco Marina Existing and Proposed Berth Size Distribution) (*Sue Chang, January 19, 2006*)

Response 2.28

CEQA requires that the *whole of the action* be evaluated, regardless of whether funding has been secured for the entire project as proposed. As such, the DEIR evaluates proposed changes in both the East and West Harbors of the marina, regardless of proposed project phasing. Please see DEIR pages II-11 – 12, Project Schedule, which states the following about project phasing, “Construction of the proposed project would take up to about 36 months (about 20 months in the West Harbor and 16 months in the East Harbor). Waterside work would be staged to limit displacement of marina tenants. The staging would involve replacing portions of the floats and pilings and performing associated dredging in sections of the marina, with marina tenants temporarily relocated during each stage. A tenant relocation plan would be developed in conjunction with project design work to minimize the number and duration of temporary relocations. It is expected that temporary locations would be provided for most tenants who choose to stay at the marina during project construction.

First, the slips adjacent to the north jetty (at the entrance channel to the West Harbor) that have been removed over the years would be rebuilt. These rebuilt slips would then be used as temporary accommodation for boats displaced as construction proceeds from one area of a harbor to another. After design and permitting, project construction would be phased to begin in the West Harbor (where construction is expected to last for 20 months) and then move to the East Harbor (where construction is expected to last for 16 months). Landside work would occur over the same period, concurrent with waterside work. Construction is expected to begin in 2007.”

While funding from DBW is available for renovations to the West Harbor only, page II-12 of the DEIR states that, “The costs associated with the proposed renovation of the East Harbor would be approximately \$19,500,000. These additional project costs for renovations to the East Harbor would be funded primarily through additional loans from the DBW, although several other funding mechanisms may be used.”

COMMENT 2.29

Under the proposal they intend to spend two million dollars to turn the degaussing station into a harbor office to give the harbor master a better view. I think two million dollars is way too much to give somebody a better view. (*Rene Monchatre, Public Hearing Transcript, October 6, 2005*)

Response 2.29

The comment relates more to the merits of the proposed project than to the adequacy of the environmental evaluation. To clarify, however, the Degaussing Station would be renovated for use as a new Harbor Office because it is more proximate to both the East and West Harbors (see DEIR page II-12, Project Sponsor’s Objectives). Under current conditions, only marine operations in the West Harbor are visible to the harbormaster from the Harbor Office. The Degaussing Station is a location that is physically and visually more accessible to the entire marina. It will also allow for improvement of boaters’ facilities in the West Harbor without expansion of the existing Harbormaster’s office building. DEIR page III.B-10, Figure 7B, provides a visual simulation of the proposed Harbor Office from the Marina Green looking north. The DEIR concluded that, “The proposed project would renovate the vacant Degaussing Station for use as the Harbor Office, without adding square footage to the building. Most of the renovations would occur to the interior of the building and would generally not affect exterior views. The project would remove the signage and chain-link fencing surrounding the structure. Thus, changes to the Harbor Office would not substantially degrade or obstruct publicly accessible views at this location.” The cost of the proposed renovation referenced in the comment is not an environmental issue.

COMMENT 2.30

Does the Project Sponsor plan any beautification of the parking area to more closely represent the guidelines of the Planning Code and the DBW as it relates to the vehicle parking along the public shoreline? (*Sue Chang, January 19, 2006*)

Response 2.30

The commenter's request to modify the scope of the project to include shoreline beautification is noted. The proposed project includes parking lot access control barriers and restriping of the existing after-hours boater parking areas. No other changes to the parking areas beyond those described in the DEIR are planned at this time.

COMMENT 2.31

Objective #4 states: "Relocate the Harbor Office to a Site near both the West & East Harbors." It is not disclosed why this is a valid Objective or why moving the Office to the Degaussing site is necessary. Further, it is inaccurate to state that the Degaussing Station site is near the East Harbor. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.31

The harbor office is included as a component of the proposed project in order to improve effectiveness of harbor operations. As noted on page II-13 of the DEIR, "Due to current office space constraints and inefficiencies (lack of ADA accessibility) in the existing Harbor Office, and the inability to enlarge the building due to site constraints, the Degaussing Station would be renovated to be the new Harbor Office, and to make the Harbor Office accessible to people with disabilities and those who need assistance or information from the harbormaster. Moving the Harbor Office to the Degaussing Station would also free up space to convert the existing Harbor Office to an ADA-compliant public restroom. The relocated Harbor Office in the renovated Degaussing Station would be roughly equidistant from the East and West Harbors. Currently, the Harbor Office is located in the West Harbor, over half a mile from the East Harbor, making it difficult to oversee boating activities in this part of the marina."

COMMENT 2.32

Objective #2 states: "Protect marina structures from locally generated wind-waves from the north and northeast directions." Project Sponsor asserts that loss of berths in the West Harbor occurred as a result of wave action from the north and northeast directions. This is inaccurate and the DEIR should explore this. There has not been any documented case of loss of berths in the West Harbor as a result of wave action. The several berths that were lost over time were the result of massive sand encroachment to the south of the St. Francis Spit. This is a direct result of historic lack of routine sandmining to the north of the Spit, which resulted over time in the movement of the sand around the tip of the Spit and its deposition to the south of the Spit, knocking out several berths in its path. The Marina Renovation DEIR fails to address this issue and relies on Project Sponsor's assertion that additional breakwaters are needed in the West Harbor to prevent berths from being destroyed. New West Harbor breakwaters will do nothing to prevent sand encroachment; the sand will simply be moved to other locations. Sand encroachment can only be prevented by routine sandmining. Construction and placement of additional breakwaters in the Outer West Harbor area will increase sedimentation in areas where currently sedimentation does not exist. This will increase the need for maintenance dredging. This issue is inadequately addressed in the DEIR. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.32

The purpose of the proposed breakwaters is to protect marina structures from locally generated wind-waves and boat waves generated by large ships, ferries, and sightseeing charter vessels traveling outside the harbor entrance from the north and northeast directions. The marina is currently unprotected from such waves and their associated shoaling, causing damage to the facility over time. Please see page 1 of the San Francisco Marina Renovation Study (Moffat & Nichol, 2002), which states that “The outer basin [of the West Harbor] once had 93 slips, but 21 have been lost due to damage from waves and from shoaling at the slip.” This information is also reflected on page II-6, footnote 4, of the DEIR. Sand movement, also known as *sedimentation*, is a natural process controlled by wind-generated wave action, tides, and current patterns. Existing sedimentation patterns in and around the marina, as well as potential changes to sedimentation as a result of the proposed project, are described in detail in Appendix C of the DEIR, San Francisco Marina Renovation Project Breakwater Feasibility Study, beginning on page 4. As noted in the study, ongoing sedimentation processes around the tip of the jetty would continue under project conditions, and sand would have to be dredged from this area under existing and project conditions. The areas of shoaling may shift slightly as a result of the proposed breakwaters, but maintenance dredging would occur with or without the project, and in accordance with existing Army Corps of Engineers permits. Therefore, changes to the ongoing practice of dredging in the West Harbor are not foreseen as part of this project. These findings are also summarized in DEIR Section III.D, Soils, Geology, and Seismicity. Please see page III.D-15.

Finally, breakwaters are a recommended design feature to protect the City’s and State’s investment from significant storm damage due to wave action. DBW has reviewed and approved funding for the project based on the design of these breakwaters and other project features.

COMMENT 2.33

The DEIR is incomplete because it does not calculate total volume of Bay fill, represented by the two new West Harbor breakwaters, the East Harbor breakwater, the additional piles, and the additional docks over present conditions. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.33

Table 1, Proposed Waterside Improvements, page II-8 - 12, provides fill estimates under project conditions in both the East and West Harbors of the marina due to breakwaters and floating docks. The estimated fill associated with new piles is included within the range of the fill estimates for the floating docks, but is not expressed individually. As noted in the table, approximately 705 creosote-treated wood piles would be replaced with approximately 750 concrete pilings, for an increase of about 45 piles. Assuming each pile is about one foot square, that would result in an increase of 45 square feet of additional fill associated with new piles. The fill estimates provided are adequate for CEQA review purposes, and are not intended to represent final fill volumes or totals, as the project design has not been finalized.

COMMENT 2.34

Re: Table 1 “Proposed Waterside Improvements,” pII-8, “Outer Basin Breakwater” – “Proposed Project Improvements”: Please state the exact location of the 150 foot long breakwater perpendicular to the jetty. Please provide the shape and the dimensions of this breakwater, as related to MHT, MLLW and to the bottom. Please express volume of fill in terms of cubic feet. Please state the exact location of the 200 foot long breakwater perpendicular to the Marina Green Seawall (Fair’s Seawall). Please provide the shape and the dimensions of this breakwater as related to MHT, to MLLW and to the bottom. Please express volume of Bay fill in terms of cubic feet. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.34

The approximate location of the proposed West Harbor breakwaters is shown in Figure 3, Proposed Site Plan, page II-7. As noted in Table 1, both proposed breakwaters in the West Harbor would result in the placement of approximately 10,000 to 15,000 square feet of new fill below mean high tide (MHT). The fill estimates and general location of the breakwaters provided in the DEIR are adequate for CEQA review purposes, and are not intended to represent final fill volumes or totals, as the project design has not been finalized. Please refer to Response 2.4 for additional information.

COMMENT 2.35

The Project Sponsor’s “Environmental Review Application” Fall, 2002, Table 3, states: “estimated maximum new fill for both West Harbor breakwaters = 16,000 cu.yds. below MHT and 9,000 sq.ft. at MHT. The DEIR Table 1, pII-8 “Outer Basin Breakwater(s)” states “10,000 to 15,000 sq.ft. of new fill below MHT.” These design quantifications differ by 40% between the two documents. Which is correct? What is the significance of the disparity? (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.35

The project description in a Draft EIR is often a refinement of the information provided in the initial environmental evaluation application to the Planning Department. It is typical for the project descriptions to change somewhat over the time that elapses between initial submittal of the application and distribution of a DEIR. The DEIR appropriately reflects these changes that have occurred since the initial submittal of the application. As such, the fill estimates provided in the DEIR reflect the most recent understanding of the project, and are considered adequate for CEQA review purposes.

COMMENT 2.36

DEIR Table 1 pII-8 states that removal of “Inner Basin Breakwater would result in the removal of 12,000 cu. yds. of existing fill below MHT.” Please, disclose the source of this calculation. Has this calculation been verified by any independent agency. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.36

All fill estimates, including estimates of the amount of fill that would be removed as a result of the elimination of the east-west and north-south moles, were provided by the project sponsor, and are considered adequate for CEQA review purposes.

COMMENT 2.37

DEIR Table 1 pII-9 “Slip Size” – “Existing conditions”. This table differs from the “1997 SF Marina Berth Count Existing Layout,” Moffatt & Nichol Engineers, Job No.4857, which is the baseline for this Project. Notably omitted from the DEIR Table 1 are 6 90 foot berths. There are variations in all length categories except 45 feet, 50 feet, and 70 feet. Please explain these deviations. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.37

The slip numbers and sizes provided in Table 2 of the Moffat & Nichol report in 2002 (Job No.4857), which serves as the baseline for the proposed project, are consistent with the existing slip counts and sizes provided in DEIR Table 1.

There are differences when comparing the 2002 (proposed project) slip size and distribution with that found in Moffat & Nichol’s earlier 1997 report; San Francisco Marina – Engineering Feasibility Study for SFDPW. Page 13 of the 2002 report describes how the project design evolved from the 1997 plan due to input from the Marina Advisory Committee, which consisted of representatives from stakeholder groups, including the Marina neighborhood. Most of the differences in each length class between the two reports amount to about two slips for each length category. Slip lengths were based on harbor records, which in turn reflect changes in operation and maintenance practices over the years, meaning that slips go in and out of use over time. As noted previously, a number of slips in West Harbor have been lost due to wave damage, and account for some of the differences between the studies’ records. Finally, the 90-foot slips mentioned in the comment are among those that have been removed from the proposed project since they are used and maintained exclusively by the St. Francis Yacht Club. As no changes to the Club’s 90-foot slips are proposed as part of the project, they were excluded from the project site boundary (see Figure 3, page II-7) and Table 1 in the DEIR.

COMMENT 2.38

Please re-do in its entirety the DEIR Table 1 pII-9, “Slip Size” – “Existing Conditions” and “Proposed Project Improvements.” The revised Table should list current berth size distribution by location, that is by breaking down the berth size counts to reflect current and proposed conditions in the East Harbor; the Outer West Harbor; and the Inner West Harbor. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.38

The commenter's request regarding revisions to Table 1, specifically related to slip size and distribution, is noted. The information provided in Table 1 is considered adequate for CEQA review purposes. For the purpose of the environmental analysis, an average increase in boat size was assumed. For more information about the current berth size distribution by location, please see Tables 1 and 2 in San Francisco Marina Renovation Feasibility Study (Moffatt & Nichol, 2002).

COMMENT 2.39

Removal of the Harbormaster's Office to a Renovated Degaussing Station: I strongly oppose this aspect of the plan. It is probably the worst idea in the whole plan. The degaussing station is an eyesore and should be torn down. (*Bruce Munro, January 16, 2006*)

Response 2.39

The comment relates more to the merits of the project than to the adequacy of the environmental evaluation. The visual and aesthetic effects of renovating the former Degaussing Station for use as a new Harbor Office are addressed in DEIR pages III.B-8 and 9. From the standpoint of visual impacts, the proposed project would involve reuse of an existing building, and therefore the interior remodeling the Degaussing Station would not affect the existing view.

COMMENT 2.40

There is no public benefit whatsoever from this plan. In fact, the 750,000 San Franciscans who do not own boats but use the park do not derive any public benefit from this plan. (*Joan Girardot, Public Hearing Transcript, October 6, 2005*)

\$38.8 million of public monies will be spent on this Project, yet the DEIR is unclear as to what will be the benefit of this Project to the general [non-boating] public. Please describe in detail what is the benefit of this Project to the general [non-boating] public. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 2.40

The purpose of the proposed project is to renovate the marina, and the project would ultimately be financed through tenant and harbor user fees. Tables 1 and 2, Proposed Landside Improvements and Proposed Waterside Improvements, respectively, on pages II-8 – 10 of the DEIR, identify project benefits to the boating and non-boating public alike. Public benefits of the proposed project are also identified by number on Figure 3, Proposed Site Plan, on page II-7. Some of the public benefits of the proposed project for non-boaters include two ADA-compliant ramps, each accessing two public access docks (one in each harbor), public access along a portion of the existing (East Harbor) breakwater, renovations of the existing restrooms for ADA-compliance, including conversion of the existing Harbor Office to be used as public restrooms and boaters' restrooms and showers. Public benefits of the project are also described in Section III.A, Land Use, Plans, and Policies. This

section describes the consistency of the proposed project with the existing land use policies for the site.

3. LAND USE, PLANS, AND POLICIES

COMMENT 3.1

I have some issues to bring to your attention. Our harbor has been a strictly recreational harbor for 75 years. On July 12, 2005, the Board of Supervisors passed legislation permitting use of the harbor by commercial boats, by establishing commercial dock fees. This is a major change of the land use. This legislation allows commercial use by dining cruises, party boats, sight seeing boats, whale watching charters, commercial fishing boats, water taxis etc. We can reasonably expect bus loads of tourists being loaded and off loaded at the project's proposed 200 foot long guest dock at the Marina Green. You must all be so tired of listening to all of this tonight. The impact of this change of use, the foreseeable increase in traffic, noise, congestion, the increased use of the pump-out facilities, and increased intensity of use of the shoreline recreational area must be evaluated in the final Environmental Impact Report. The final report must also specify the exact location of these guest docks. (*Lois Rosano, Public Hearing Transcript, October 6, 2005*)

I live a block and a half from the Marina Green. I live there because of the Marina Green. I love the Marina Green. Our children play there, we go there every day. I hope that it will not become a commercial space. (*Jill Sinclair, Public Hearing Transcript, October 6, 2005*)

Develop this property for commercial interest? This is a public jewel and it shouldn't be converted to private benefit. The greens will be well populated this weekend with fleet week. The greens are used constantly, daily. July 4th is another big weekend. (*Marilyn Amini, Public Hearing Transcript, October 6, 2005*)

But most of the other comments have been made in regards to, you know I think talk about the commercialization and things is important but we start getting into a point where we're talking more about the project than the environmental impact of it. (*Commissioner Antonini, Public Hearing Transcript, October 6, 2005*)

As far as the commercial uses of the harbor are concerned, yes, this is of great concern to us because if you allow commercial boats in here, you have different environmental impacts. (*Joan Girardot, Public Hearing Transcript, January 12, 2006*)

There is a large charter or excursion boat currently departing from west harbor on week ends and I know of no land use permit. Please help me with date for land use change permit issued (if any) from recreation to commercial use. (*Will LeRoy, undated*)

No commercialization of the existing uses should be part of this project. Cruise ships, and the like, embarking or disembarking here would obviously have many significant, unavoidable impacts not studied in the EIR. (*Brian W. Veit, October 17, 2005*)

Does the City plan to continue and/or expand the commercial use of the Harbor Office? Please evaluate any further potential use of the Harbor Office site on the basis of environmental impact in addition to the legality within the State Gift of the Shoreline Open Space to the City. (*Sue Chang, January 19, 2006*)

In July 2005, the Board of Supervisors passed legislation establishing commercial dock fees, thereby establishing a commercial boat use of the harbor. No mention of impacts from such a change of use is evaluated in the DEIR. Please discuss expected impacts in the FEIR. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

The expansion and addition of guest docks, and the new use as a “Commercial Dock” requires review of impacts on the parking in the Harbor parking lots, impacts on traffic with the potential increase in tourist activity, taxi cabs and tour buses, noise levels, etc. Even if these are non-profit whale watching tours, as Mr. Agunbiade testified, there are still parking and traffic impacts associated with the operation of a non-profit business. (*Sue Chang, January 19, 2006*)

Response 3.1

While the San Francisco Marina is intended primarily for the use and enjoyment of recreational boaters, the Department of Recreation and Park has always allowed a limited amount of commercial activities to occur at the marina. For example, approximately half a dozen small boat commercial fisherman dock in the East Harbor. The commercial dock fee is part of existing ongoing marina operations and is not part of this EIR. The DEIR considers the potential physical impacts of the proposed project, including use of docks in both harbors under the commercial dock fee structure.

On July 12, 2005, the Board of Supervisors passed Ordinance No. 162-05 amending Section 12.11 of the San Francisco Park Code to establish new fees for all types of goods and services which occur at the marina on a regular basis, including berth rental fees, electrical fees, guest dock fees, parking fees, and storage fees, etc. The revised guest dock fee included both recreational dock fees and commercial dock fees. The latter fees established at \$2.50 per (linear) foot and \$1.00 per person. While the proposed project would include new guest docks to replace the existing ones in both the East and West Harbors where commercially-oriented boats could berth in the future, these uses, which the Department of Recreation and Park allowed previously without charge, would be temporary and sporadic, and are not intended or anticipated to greatly increase from existing conditions as either a result of the proposed project or due to the recent establishment of commercial guest dock fees.

The Department of Recreation and Park intends to revise the commercial dock regulation through new legislation which limits commercial use of West Harbor to non-profit operators providing maritime, recreation or educational opportunities to the public. Therefore, no substantially new or incompatible land uses would be associated with proposed project, including those which may be associated with the establishment of commercial guest dock fees.

The commercial dock fee does not represent a change from existing conditions, other than allowing the City to charge for commercial dock use, and thus no parking or traffic impacts associated with this fee would be expected.

COMMENT 3.2

The other thing that I think is very important that wasn't include in the project scope is the marina green and the fact they want to build a [maintenance] building on the east marina green when the west marina green and the main marina green is fully occupied and permitted most of the time, the east open space is one of the only spaces not permitted out. All the open space is crucial to us. (*Sue Chang, Public Hearing Transcript, January 12, 2006*)

The location of the maintenance facility will present a significant, and easily avoided impact to the open space by the East Harbor. (*Brian W. Veit, letter, October 17, 2005*)

Is it necessary to place the proposed building in the center of the East Harbor open space? The DEIR also does not take into account that the proposed building would sit right in the middle of the only open space in the East Harbor, dividing it into two smaller, less attractive areas. The existing restroom building is sited on the edge of the space abutting the parking lot, and does not divide the space, as would the proposed maintenance building. (*Alan Silverman, Marina Community Association, January 18, 2006*)

The siting of the proposed building will interfere with recreational uses of the open space. The space is presently used by families with young children; young adults playing games that require open space, and senior citizens exercising. Is a maintenance building in the middle of the space compatible with these uses? (*Alan Silverman, Marina Community Association, January 18, 2006*)

This DEIR has not adequately evaluated the need for the maintenance building. (*Sue Chang, January 19, 2006*)

The siting of the proposed building would interfere with recreational uses of the open space. The space is presently used by families with young children, and young adults playing games that require open space. A maintenance building in the middle of the space is incompatible with this use. This is particularly so when one considers, as the Draft EIR does not, that a driveway to the building will be necessary for maintenance trucks which are likely to be parked most of the time next to the building. The coming, going and parking of vehicles on the open space will transform its character to that of an industrial area. The Draft EIR contention that the proposed building will only use 2% (not 0.02% as stated at S-5 and III.A-10) of the 2 acre open space and therefore will not interfere with recreational and open space uses is immaterial because it ignores the siting of the proposed building. (*Michael Spiegel, September 27, 2005*)

If the new construction on the East Harbor Open Space would reduce the useable open space by 2 percent (not 0.02%), does that constitute a significant impact on the useable open space? Please analyze actual lawn space that will be out of use, including needed driveways, paths and space between buildings. (*Sue Chang, January 19, 2006*)

Inaccurate: “The project would also expand the 1,970 sq. ft. restroom facilities in the East Harbor by approximately 600 sq. ft. to add tenant showers and restrooms. This action would represent a minor expansion and an enhancement of a current use and would bring the publicly accessible facilities up to ADA compliance.” (*Sue Chang, January 19, 2006*)

What is the actual size of the lawn-only portion of the East Harbor open space? What percentage of the existing lawn-only portion in the East Harbor would be eliminated by the expansion of the bathroom, the addition of a maintenance building, a driveway to the building and additional use surrounding the maintenance building? Please certify by independent agency. (*Sue Chang, January 19, 2006*)

The DEIR is inadequate because it fails to recognize the importance of the wide range of recreational activities available at the Major City Park, known in its entirety as the San Francisco Marina. It is negligent to ignore the significance of the Marina Green and the East and West Harbor Open Spaces, and to disregard the open views of the lawns, the bay and beyond. (*Sue Chang, January 19, 2006*)

Response 3.2

DEIR page II-13 states, “The Department of Recreation and Park would construct a new maintenance facility to replace the current maintenance facility, which is in a structure owned by the SFPUC, which has expressed the desire to close this facility. The new maintenance building would be located at the East Harbor to be more centrally located, and for its adjacency with other structures in the area (the East Harbor restrooms).”

The potential effects of the proposed maintenance building in the East Harbor open space area are addressed in Section III.A, Land Use, Plans, and Policies. As stated on page III.A-9 – 10, “The proposed maintenance building in the East Harbor area would be constructed on about two acres of land dedicated primarily to open space (except for the East Harbor restroom and parking lots). While the maintenance building would occupy about 1,000 square feet of the project area currently unoccupied by structures, such use would not be inconsistent with the recreation and park uses on the site, as it would be an ancillary structure devoted to maintenance of the recreation facilities.” Furthermore, the maintenance use is not new as the use would shift from the SFPUC building, which already exists on the project site, to the new maintenance building. The project would also expand the 1,970-square-foot restroom facilities in the East Harbor by approximately 600 square feet to add tenant showers and restrooms. This action would represent a minor expansion and an enhancement of a current use and would bring the publicly accessible facilities up to Americans with Disabilities Act (ADA) compliance. The proposed maintenance building would occupy 0.02 acres or two percent of a two-acre open space area. Please see Section D, Staff Initiated Text Changes, for the following clarification regarding the size of the proposed maintenance building in relation to the size of the East Harbor open space area.

“The construction of the maintenance building and the expansion of the restrooms in the East Harbor open space area would reduce the usable lawn area by about 0.02 acres, or about two percent of the two-acre open space area, a relatively small amount which would not preclude the use or enjoyment of the area for recreational purposes.”

The proposed maintenance facility is located in a manner that does not preclude continued recreational use of the East Harbor open space. The new facilities would not disrupt or divide the physical arrangement of the marina facility and would not have a substantial impact on the character of the marina. Therefore, the DEIR appropriately concluded that the proposed maintenance building would have no significant land use or open space impacts.

The project sponsor does not plan to construct a new driveway to access the proposed maintenance building or provide temporary parking adjacent to the building, as sufficient parking spaces are provided immediately east of the facility in the East Harbor parking lot. Similarly, materials storage would occur within the proposed maintenance building, not outside of it. However, if such uses were to occur, they would be temporary in nature, and therefore would not substantially conflict with existing recreational uses in the East Harbor open space area on a permanent basis.

While no significant impacts of the proposed maintenance building are anticipated, due to the amount of public concern about changes to the East Harbor open space area, the following improvement measure about selection of a location for the proposed maintenance building has been included in Section D, Staff Initiated Text Changes:

“Select a location for the maintenance building that maximizes both preservation of the existing open space and protection of existing views. Work with the community to identify the preferred location for the structure.”

COMMENT 3.3

The proposed maintenance building is inconsistent with the San Francisco General Plan and Planning code. The proposed maintenance building will unacceptably interfere with recreational and open space uses on the East Harbor open space, and will have a substantial adverse impact on the project site and the neighborhood character of the site's vicinity. (*Michael Spiegel, September 27, 2005*)

Construction of the proposed maintenance building would, as explained below, conflict with three of the elements of the San Francisco General Plan and Section 101.1 of the Planning Code (Prop M). Open Space and Recreation Element: Policy 2.2: Preserve existing public open space. Urban Design Element: Policy 1.1: Recognize and protect major views in the city, with particular attention to those of open space and water. Policy 3.2: Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance. Environmental Protection Element: Policy 3.2: Promote the use and development of shoreline areas consistent with the General Plan and the best interest of San Franciscans. Planning Code Section 101.1 Priority Policies: (8) protection of open space. (*Michael Spiegel, September 27, 2005*)

East harbor maintenance building is unnecessary and would violate several city codes (*Alan Silverman, Marina Community Association, January 18, 2006*)

The proposed maintenance building is not in compliance with Section 101.1 (b) (8) of the City Planning Code which requires “that our parks and open space and their access to sunlight and vistas be protected from development”. The proposed maintenance building is not in compliance with the City Master Plan

Element concerning Recreation and Open Space (Part 2), which sets as an objective to “maintain the quality and character of the Marina Green” from the Presidio to Gas House Cove. The proposed maintenance building is not in compliance with the City Plan Element regarding Recreation and Open Space (Policy 2.2), which states that “it is essential that the City preserve the public open space which remains”. The proposed maintenance building is not in compliance with the City Plan Element regarding Environmental Protection Element (Policy 3.2) which is to “Promote the use and development of shoreline areas consistent with the Master Plan and the best interest of San Francisco”. The proposed maintenance building is not in compliance with the City Plan Element regarding Urban Design (Policy 1.1) which requires developers to “Recognize and protect major views in the city, with particular attention to those of open space and water”. The proposed maintenance building is not in compliance with the City Plan Element regarding Urban Design (Policy 3.2) which requires developers to “Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance” (*Alan Silverman, Marina Community Association, January 18, 2006*)

With the addition of 1600 sq. ft. of new construction to the East Harbor Open Space, the proposed project appears to be in direct conflict with policy 2.2. (*Sue Chang, January 19, 2006*)

Occupation, instead of demolition of the former Degaussing Station appears to be in conflict with this objective [Open Space and Recreation Element, Objective 3]. (*Sue Chang, January 19, 2006*)

The Recreation & Open Space Element states the following: “Maintain the quality and character of the Marina Green.” Please discuss the meaning of this General Plan mandate and how the proposed Project satisfies this mandate....Does this Project require a finding of conformity with the General Plan and with the eight Priority Planning Policies of Sec. 101.1(b)? Why is non-conformity not a CEQA issue? (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 3.3

Page III.A-5 of the DEIR states that, “A conflict between a proposed project and a General Plan policy does not, in itself, indicate a significant effect on the environment within the context of CEQA. Any physical environmental impacts that could result from such conflicts are analyzed in this EIR. In addition to considering inconsistencies that affect environmental issues, the Planning Commission considers other potential inconsistencies with the General Plan, independently of the environmental review process, as part of the decision to approve or disapprove a proposed project. Any potential conflict not identified in this environmental document would be considered in that context and would not alter the physical environmental effects of the proposed project that are analyzed in this EIR.” Therefore, even if the proposed maintenance building were found to be consistent with certain General Plan policies and potentially inconsistent with others, any physical environmental impacts that could result from the construction of this facility are analyzed in the DEIR. Nevertheless, relevant San Francisco policies were identified in DEIR Section III.A, Land Use, Plans, and Policies.

Potential interference of the proposed maintenance building with existing recreational uses in the East Harbor open space area is addressed on pages III.A-9 – 10, which concludes that the building

would not substantially preclude the use or enjoyment of the area for recreational purposes because it would reduce open space area by a relatively small amount when compared to the open space as a whole (about 2 percent of the entire open space area). This building would be constructed adjacent to existing structures (the East Harbor restrooms) that are located near the eastern edge of the East Harbor open space area. As a result, no significant land use impacts associated with new construction or expansion in the East Harbor open space area are expected.

This building's potential effects on neighborhood character are addressed in Section III.B, Visual and Aesthetic Resources. As stated on DEIR page III.B-16, "The proposed maintenance building and exterior modifications to the East Harbor restroom would incorporate design elements of existing onsite buildings, including details of fenestration, color, and building materials. The proposed project would not result in substantial, adverse visual changes, since improvements would generally be consistent with the visual character of the marina." The visual simulations in the DEIR do not include these architectural features that would be incorporated in the building design to promote consistency with the marina's existing character.

COMMENT 3.4

First of all, I would like to speak out against the removal of the north/south mole at the end of Scott Street. Due to its location and the deck at the end of the mole, it is a popular access point and it's extremely well used. (*Sue Chang, Public Hearing Transcript, October 6, 2005*)

The Draft EIR basically says that this [north-south] mole is used for sport fishing and that those fishermen can go along the seawall. I don't believe that to be accurate. (*Sue Chang, Public Hearing Transcript, January 12, 2006*)

I am opposed to the removal of this [north-south] mole. It provides pedestrian public access to the harbor and provides a valuable breakwater for the inner west harbor. (*Bruce Munro, January 16, 2006*) 194

The DEIR does not adequately address the effects of the removal of the north-south mole at the foot of Scott Street. (*Sue Chang, January 19, 2006*)

Why is the outlook deck, the accessibility issues and the popularity of this mole ignored in the Draft EIR? How is the loss of this mole as an access point for seniors and families with small children going to be mitigated? (*Sue Chang, January 19, 2006*)

Removal of the Scott Street Mole, which provides a wide north-south access into the West Harbor, is also in conflict with the objective of providing public access along the shoreline. (*Sue Chang, January 19, 2006*)

While public access to this existing breakwater is a welcome addition to the project, it can not be considered an appropriate mitigation to the removal of the popular pedestrian access of the Scott Street Mole. (*Sue Chang, January 19, 2006*)

Removal of the north-south Scott Street mole will eliminate important public access to the West Harbor. This mole provides park benches, tree shade, and a public viewing platform above sea level, which enables the public to get close to the boats and also provides important public views outward to Alcatraz and the East Bay hills. It is a very pleasurable spot, and very popular with the public at the present time. What will be the mitigation for the loss of this public access amenity? (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 3.4

It should be noted that sport fishing is not permitted on the moles or anywhere in the harbor. This provision is reflected in Section D, Staff Initiated Text Changes, which states the following:

“In addition, the loss of the mole at the foot of Scott Street, which is a popular destination for public viewing, seating, strolling, etc., would not have a significant land use impact, as these uses would continue to be available in other locations at the marina, including the entire length of the Fair’s Seawall as well along the ~~new West~~ East Harbor breakwaters.

While the mole may be used for public viewing, seating, strolling, etc., the removal of the mole would not substantially limit these other activities, considering the extent to which these other activities are available throughout the marina. The proposed project would provide additional public access opportunities that currently do not exist, such as public access along the East Harbor breakwater and access to new guest docks in both harbors. The proposed public access enhancements are included as part of the proposed project, and are not intended as mitigation for the loss of the north-south mole, in particular, as no significant land use impacts related to the loss of this mole was identified in the DEIR. The DEIR concluded that the removal of the north-south (Scott Street) mole would not have a significant adverse impact on land use.

COMMENT 3.5

The Draft EIR does not consider the public implications of showers at the East Harbor restrooms. (*Michael Spiegel, September 27, 2005*)

The Draft EIR proposes an expansion of the East Harbor public restrooms to provide shower facilities for harbor tenants. See Table 2 at II-10 and II-11. The Draft EIR does not consider the implications of tenant only showers with the Board of Supervisors Resolution requiring that all city restroom facilities be open to the public to alleviate homeless persons issues. Is this an appropriate place for a public bath house? If tenant showers are necessary at the East Harbor, they should be located within the confines of the Waterside Improvements. (*Michael Spiegel, September 27, 2005*)

The Draft EIR proposes a 600 square foot expansion of the East Harbor public restrooms to provide shower facilities for harbor tenants (see page S-3). If showers are necessary for tenants at the East Harbor, they should be located within the confines of the Waterside Improvements where they will serve their intended users, and not create a public nuisance. The East Harbor parking area is already used illegally by people in recreational vehicles who park overnight and some who are living in the parking area. If the

showers are placed adjacent to the existing bathrooms, that will encourage more recreational vehicles to park illegally overnight. (*Alan Silverman, Marina Community Association, January 18, 2006*)

Response 3.5

The commenters' opinions about proposed showers in the East Harbor restrooms as a public safety problem or nuisance are noted. As noted in the DEIR Project Description, page II-13, "The East Harbor restrooms would be expanded and/or renovated for ADA compliance. They are intended for the use of boaters only, similar to the West Harbor restrooms and showers. ... Public restrooms would be open during park hours (6 a.m. to 10 p.m.), as they are currently. Boaters-only restrooms could be accessed with a key at any time, as they are currently." As the showers would only be accessible to marina tenants through the use of a key, and not to any other member of the general public, including but not limited to homeless persons or users of recreational vehicles, the proposed tenant showers are not anticipated to create a substantial public safety or nuisance problem.

Board of Supervisors' Resolution No. 475-02 urges the Mayor to request that the Department of Public Works, Department of Recreation and Park, and any other city department that has public restroom facilities which are currently closed re-open those facilities as soon as possible, and provide the necessary maintenance and cleaning to keep those facilities open and properly functioning. As the proposed project does not propose to close any public restrooms at the marina that are currently open, nor re-open any restrooms that were previously closed, the Supervisor's resolution would not apply to the proposed project.

COMMENT 3.6

For the Initial Study to assert that the reuse of a military structure, which has been vacant for decades and which never had public access, as a facility to house administrative office space is not a change in land use is preposterous. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

Response 3.6

The comment refers to the Degaussing Station, a structure used by the US Navy during World War II. As stated in DEIR page, III.A-9, "The currently vacant Degaussing Station would be renovated for use as the new Harbor Office. The project would shift both office workers and visitors from the existing Harbor Office in the West Harbor to the Degaussing Station, located on the water's edge between the East and West Harbors. However, overall usage levels of this facility and hours of operation under project conditions would represent a continuation of an existing use and are not expected to increase compared to current usage levels and hours of operation. As a result, no significant land use impacts associated with renovation of the Degaussing Station are expected."

Section D, Staff Initiated Text Changes, provides some additional information in the DEIR regarding the hours of operation of the Harbor Office:

“However, overall usage levels of this facility and hours of operation under project conditions would represent a continuation of an existing use and are not expected to increase compared to current usage levels and hours of operation (*8am to 4pm, seven days a week.*)”

In referring to “this facility,” the DEIR is referring to the harbor office function, which would be moved to the nearby Degaussing Station but would not take on any additional level of activity. As such, the DEIR appropriately evaluates the potential land use effects of the proposed reuse of the former Degaussing Station as a Harbor Office. Please see staff initiated text changes for clarification of this issue.

COMMENT 3.7

To simply state that seismic retrofit of the existing seawalls is not part of the project and therefore no evaluation is required defies Prop M which requires as a priority planning principle that any construction project achieve the greatest possible preparation for earthquake. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

Planning Code Sec. 101.1(b) establishes the eight Priority Planning Policies that projects should satisfy. Policy #6 states: “That the City achieve the greatest possible preparedness to protect against injury and the loss of life in an earthquake.” Please address how the Renovation Project without seismic retrofit of the Seawalls fulfills the mandate of Policy #6. The Seawalls form the boundary of the West Harbor; without them the harbor would be a marsh and not exist as such. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 3.7

As described in DEIR page III.A-5 – 6, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the Planning Code to establish eight Priority Policies. One of the eight policies includes: “(6) maximize earthquake preparedness.” This section of the DEIR goes on to state that, “Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. In evaluating General Plan consistency of the project and reviewing the building permit application for the proposed project, the Planning Commission and/or Planning Department would make the necessary findings of consistency with the Priority Policies.” Therefore, while the proposed project does not include seismic improvements to the adjacent Fair’s Seawall or Marina Boulevard Seawall, City decision-makers would determine whether the proposed project would be consistent with all eight priority policies prior to issuance of a building permit. The evaluation of whether the project would increase seismic hazards is analyzed in this document in Section 6, Soils, Geology, and Seismicity. Also see Response #6.1.

COMMENT 3.8

Page III.A-8: “While the proposed project would make changes to site development, it would not disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any business, residences or other uses.” The project would impact the small boat commercial fishermen that currently use the facility. There is not another comparable facility in the area that provides the necessary infrastructure to support their businesses. The project will displace these people and the DEIR fails to address this issue. The new berths design with reduced gate access will make it more difficult to move fish and gear on the docks. The existing commercial fleet consists of vessels less than 25 feet in length, and the proposed improvements would have berths 30 feet and longer. The increased costs of the new facility will also lead to displacement of these businesses. (*Ralph Kanz, October 20, 2005*)

Response 3.8

While the San Francisco Marina is intended to be used primarily for recreational boating purposes, about half a dozen small boat commercial fishermen currently dock at the East Harbor. Docking of small commercial fishing vessels is allowed in the East Harbor, but off-loading of fish for commercial purposes is not a regular activity and generally occurs elsewhere, such as Pier 45 or Fisherman’s Wharf. The number of commercial fishermen who berth at the marina is relatively small compared to the number of recreational boaters. Under project conditions, the marina would continue to be for the primary use of recreational boaters. As stated in page II-11, Project Description, “a tenant relocation plan would be developed in conjunction with project design work to minimize the number and duration of temporary relocations. It is expected that temporary locations would be provided for most tenants who choose to stay at the marina during project construction.” As such, all existing tenants at the marina, including the small boat commercial fishermen, would be provided with the opportunity to remain at the marina as renovations to the harbors are completed in a phased manner, and the project therefore would not constitute a permanent displacement of existing businesses, including commercial fishermen.

COMMENT 3.9

In order to fully evaluate the public access proposed with the project, more information should be provided in the EIR regarding existing public access at the site. For example, is the public currently allowed to access the breakwaters that would be removed with the project? Is access currently occurring on the breakwater that would be improved with a public access path? Is the public currently allowed to access any of the gangways and ramps in the marina? A site plan showing existing access with proposed new access overlaid on it would be extremely helpful in understanding current and future public access at the project site. Additionally, details regarding the proposed access are also needed such as are there opportunities for public access amenities on the breakwater (e.g., benches, etc.)? Is dedicated public access parking proposed in the vicinity of the breakwater access and the new public access dock? Providing more information will aid the staff in determining whether the public access proposed with the project is the maximum feasible, consistent with the project. (*Michelle Burt Levenson, BCDC, October 20, 2005*)

Since we believe public access was required by the original permit, it is inaccurate to state that public access will now be developed as part of the proposed Project. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 3.9

The proposed project includes removal of the north-south mole, which is not considered a ‘breakwater’ as such, but which does provide shoreline access at this point. This mole is about 150 feet long. No public access is currently occurring on the existing East Harbor breakwater. Under the proposed project, this existing breakwater would be improved with a public access path. In comparison to the approximately 150 linear feet of public access on the north-south mole that will be removed, the proposed project would create approximately 600 linear feet of new public access improvements in constructing the East Harbor breakwater. Public access amenities on the East Harbor breakwater may include benches, although because the design of the project has not been finalized, it is unknown whether these project components would or would not be included. The proposed project would not preclude the addition of such public amenities, however. Under existing conditions, the public is currently restricted from accessing most if not all of the gangways (ramps) which connect with the docks, as these gangways are fenced and locked for security purposes, and accessible only by marina tenants with keys. The proposed project would consolidate a number of these gangways, yet they would remain accessible only to tenants under project conditions. However, the proposed project would add two new public access docks, and ADA-complaint ramps to access these docks, one in each harbor. Approximately 340 existing public parking spaces are provided in the East Harbor, and the same number of parking spaces would remain. The project does not propose any intensification or use that would result in a need for additional parking.

COMMENT 3.10

Section 66605 of the McAteer-Petris Act states, among other things, that further filling of the Bay should only be authorized if it is in the minimum amount necessary to achieve the purpose of the fill and if harmful effects associated with its placement are minimized. The Draft EIR states that the final design for the breakwaters are currently in process and the new breakwaters would either be constructed of rock, sheet pile or floating material. As the amount of fill placed with each of the alternatives would differ as well as their potential impacts, it is important to provide more information regarding the final design of the breakwaters and the potential impacts in order for the staff to evaluate the potential effects associated with the fill and to determine whether the fill placement would need to be mitigated. Additionally, the EIR states that with reconfiguration and berth lengthening, an additional 34,000 square feet of fill would be placed for floating docks. As this is a considerable increase in the amount of fill at the site, it is possible that the Commission could require mitigation to offset the impacts associated with the fill placed for the docks. (*Michelle Burt Levenson, BCDC, October 20, 2005*)

Response 3.10

The DEIR identifies that the amount of fill required for the proposed West Harbor breakwaters would differ depending on whether they would be constructed from rock or sheetpile materials (see DEIR page II-8, Table 1, Proposed Waterside Improvements). Table 1 identifies that approximately 10,000 – 15,000 square feet of new fill below Mean High Tide (MHT) would be required for rock breakwaters, and that sheetpile breakwaters would require “substantially less.” The analysis therefore represents a “worst case scenario” for fill volumes. By estimating the larger amount of fill that would be required if the rock breakwater is constructed, the DEIR provides information on the type of breakwater that would be expected to have the greater potential impact. Although the breakwater design is not final, an estimate of the fill needed for a sheetpile breakwater would be about 350 feet, assuming that a sheetpile breakwater is about 1 foot wide and the total length of the two breakwaters combined would be 350 feet. This total is substantially less than rock filled breakwaters. The DEIR also identified the requirement for a major fill permit from BCDC and acknowledges the need to comply with all BCDC requirements associated with fill, including the amount of fill, as well as additional conditions of approval that BCDC may impose as part of its permit process. The project would also remove up to 16,000 square feet of fill associated with the removal or shortening of the north-south and east-west moles. Therefore, depending on the type of breakwater ultimately selected (either rock or sheetpile) the amount of fill would vary, but would be either partially or completely offset by the reduction in fill from the removal of the moles.

The DEIR evaluates the potential effects of both types of breakwaters. For example, Section III.B, Visual and Aesthetic Resources, page III.A-12, states, “Although not shown in the simulations, a metal sheetpile-type breakwater could be chosen instead of the rock-filled type. The type of material would be determined during the project design phase, but would likely consist of materials present at the existing sheetpile breakwater in the East Harbor, such as thin, corrugated-steel sheeting with a concrete cap. Sheet-metal-type breakwaters might be less visually consistent with the rock-faced seawall and outer jetty than rock-filled breakwaters, but would be no taller or longer than rock-filled breakwaters and would not obstruct views of the Bay, Golden Gate Bridge, or other long-range views. Sheetpile breakwaters could actually be less visually apparent than rock-filled breakwaters, due to their smaller footprint. Regardless of which type of breakwater is ultimately constructed in the West Harbor, no substantial adverse impacts to views or visual quality are expected.”

COMMENT 3.11

Page III.A-3 does not reference all of the applicable Plans and Policies. The EIR should be changed by adding the following from the Open Space and Recreation Element of the San Francisco General Plan. From the regional section: POLICY 1.2 “Make open space lands already in public ownership accessible to the public for compatible recreational uses”; and POLICY 1.3 “Increase the accessibility of regional parks by locating new parks near population centers, establishing low user costs, improving public transit service to parks and creating regional bike and hiking trails.” (*Howard Strassner, Sierra Club San Francisco Group, January 17, 2006*)

Response 3.11

The comment is noted, and by this comment, these policies will be included in the Final EIR, and will be considered by the City decision makers in the review of the proposed project. It should be noted that the referenced policies are in a section of the Open Space Element of the General Plan devoted primarily to open spaces outside of the City and County of San Francisco. Nevertheless, CEQA does not require that an EIR identify every General Plan policy that could be applicable to a proposed project. DEIR Section III.A, Land Use, Plans and Policies, provides 22 San Francisco General Plan policies and objectives that most reasonably apply to the proposed project. Other policies and objectives may also be applicable. As described above in Response # 3.3, page III.A-5 of the DEIR, states that, “A conflict between a proposed project and a General Plan policy does not, in itself, indicate a significant effect on the environment within the context of CEQA. Any physical environmental impacts that could result from such conflicts are analyzed in this EIR. In addition to considering inconsistencies that affect environmental issues, the Planning Commission considers other potential inconsistencies with the General Plan, independently of the environmental review process, as part of the decision to approve or disapprove a proposed project. Any potential conflict not identified in this environmental document would be considered in that context and would not alter the physical environmental effects of the proposed project that are analyzed in this EIR.” This statement in the DEIR defines the role of the environmental document in providing information about the physical effects of a proposed project. Therefore, while the proposed project may be consistent with some General Plan policies and may be potentially inconsistent with others, any physical environmental impacts that could result from the proposed project are analyzed in the DEIR as required by CEQA.

COMMENT 3.12

In fact the proposed renovation essentially eliminates historic and essential small boat access to the Bay from the Marina. All of this together makes eliminating small boats a CEQA access issue. (*Howard Strassner, Sierra Club San Francisco Group, January 17, 2006*)

The proposed renovation will deny owners of small sailboats the ability to rent a slip in the water or a dry storage space adjacent to the water. Thus, the proposed renovation will essentially deny these people access to the Bay “for compatible recreational uses” as required by Policy 1.2, at any price. Because the impact on small boat sailors is so great, the DEIR should be changed to add dry storage. Dry storage was requested by the Sierra Club in a October 4, 2005 letter to the Board of Supervisors which repeated many previous requests, by the writer, during the project planning process. (*Howard Strassner, Sierra Club San Francisco Group, January 17, 2006*)

Response 3.12

The commenter’s opinion regarding additional dry storage at the project site is noted. Page II-11 of the DEIR states that “a tenant relocation plan would be developed in conjunction with project design work to minimize the number and duration of temporary relocations. It is expected that temporary locations would be provided for most tenants who choose to stay at the marina during project construction.” Tenants who choose to stay at the marina after completion of the

improvements will be relocated to a permanent slip in accordance with a proposed relocation plan. As such, all existing tenants at the marina, including the owners of small boats, would be provided with the opportunity to remain at the marina as renovations to the harbors are completed in a phased manner, and in accordance with a relocation plan.

A draft post-project berth movement policy has been prepared by the Department of Recreation and Park. This draft plan is provided in Appendix 3 of this document.

DEIR page II-11 also states that, “The East Harbor parking area would be improved by renovating an existing boat hoist for boat launching and utilizing the former boat trailer storage area immediately southeast of the boat hoist. The roughly 13,600-square-foot boat trailer storage area is currently unused because the boat hoist is non-operational, but has the capacity to hold about 24 trailered boats at one time. Once the boat hoist has been renovated, it is expected that trailered boat storage would return on a daily basis, and that some owners of the small craft currently berthed at the marina would convert to put-in/take-out use.” In this way, under the proposed project, some dry storage would be provided.

Therefore, due to the project phasing, duration of the construction period, and tenant relocation plan, it is not anticipated that the proposed project would restrict Bay access to owners of small boats, in particular, as these boaters would, 1) choose to relocate to other portions of the marina once renovations are complete, 2) decide to use the renovated boat hoist in the East Harbor for put-in/take-out, or, 3) seek other berthing (or put-in/take-out) opportunities elsewhere in the Bay Area.

COMMENT 3.13

Why was a statement made regarding access onto the breakwater? Where is it stated in the feasibility study or any of the other documentation that there will be public access to the proposed West Harbor breakwaters? (*Sue Chang, January 19, 2006*)

Response 3.13

Please see Section D of this document, Staff-Initiated Text Changes, for revisions to the DEIR text to state that public access would be provided on the proposed East Harbor breakwater, not the new West Harbor breakwaters, unless required by BCDC.

COMMENT 3.14

Why did the Draft EIR change the project site to exclude the Marina Green and the public promenade, when they are clearly defined as part of the San Francisco City Park known as the San Francisco Marina?Please evaluate views from the Greens, park users and activities that are permitted on the Greens as part of the Environmental Impact Report. (*Sue Chang, January 19, 2006*)

Please discuss why the Marina Green and Marina Promenade were excluded from the Project boundaries. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

While the harbor and the boats are an important characteristic of the Marina neighborhood, the predominant and defining characteristic of the Marina neighborhood is the Marina Green and the open shoreline. Please evaluate the components of the project as they affect or are affected by the most frequent park users, which are the non-boating public. (*Sue Chang, January 19, 2006*)

Response 3.14

The project site boundaries were refined in the DEIR to reflect public comments received during the appeal of the Preliminary Negative Declaration (PMND) and during the EIR scoping meeting that was held on October 27, 2004. As the proposed project would not modify the Marina Green and public walkway, this area was excluded from the project site boundaries. It should be noted that excluding the Marina Green and public walkway from the project description does not preclude discussion of the impacts of the proposed project on these adjacent land uses. In fact, the DEIR evaluates the project's potential effects on the use of the Marina Green, as described in Section III.A, Land Use, Plans, and Policies (see page III.A-8, Land Use Changes). Scenic views from the Marina Green looking toward various project components are provided in Section III.B, Visual and Aesthetic Resources. No adverse impacts to the Marina Green resulting from the proposed project were identified in the DEIR.

COMMENT 3.15

How does the Planning Department conclude that the proposed plan, which eliminates 265 berths, size 30 ft and smaller, does not "disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any businesses, residences, or other uses." There is an established use for small, entry level boats for people of lesser means. (*Sue Chang, January 19, 2006*)

The DEIR does not adequately study the impacts of the elimination of 265 berths, size 30 ft and smaller. (*Sue Chang, January 19, 2006*)

How will the existing occupants of the 113 small berths in the West Harbor be accommodated after completion of Phase 1 of the proposed project? (*Sue Chang, January 19, 2006*)

By accommodating 40 fewer boats overall and by eliminating 265 berths size 30 ft and smaller, it will be impossible to accommodate existing tenants when the renovation is complete. Alternative affordable storage solutions are not readily available. After the proposed redistribution of berth sizes, not only will 265 boats be without a berth, but an additional 181 waitlist applicants (some on the waitlist as long as 20 years) will have to look elsewhere for accommodations for their small boats. (*Sue Chang, January 19, 2006*)

After renovation, not only will 265 boats potentially be without a berth, but an additional 181 waitlist applicants (some on the waitlist as long as 20 years!) will be forced to look elsewhere for their small boat accommodations. Having a "trailer storage" area for 24 trailers and a renovated hoist will not adequately serve the needs of and will displace many small boats. (*Sue Chang, January 19, 2006*)

Response 3.15

As described on DEIR page III.A-8 – 9, “While the proposed project would make changes to site development, it would not disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any businesses, residences, or other uses. Although existing boat tenants could be temporarily relocated during construction, they would not be permanently displaced by the project, as they would have the opportunity to return once renovations are complete. Maritime and recreation uses, however, have been ongoing at the site and vicinity for many years, and the proposed project would therefore be consistent with the site’s existing uses. Implementation of the project would result in fewer, although (on average) longer, berths in the marina, which could attract some larger boats to the marina; however, several boats currently moored at the marina are in berths that are too small, and some marina tenants are expected to move their boats into the larger berths (Gross, 2004). Even the addition of somewhat larger boats would be a continuation of a compatible use in the project area. Reoriented slips or the addition of slips and docks within the outer basin of the West Harbor where none currently exist would also be a continuation of compatible uses in the project area and therefore would not have a significant land use effect.” Therefore, the DEIR appropriately evaluates the change in berth size in terms of potential land use effects. The proposed project is consistent with the existing and intended use of the marina and is therefore not considered to have significant land use impacts under CEQA.

As described above in Response 1.6 and 3.13, because of the project phasing, the duration of the construction period (36 months), and the use of tenant relocation plan, existing tenants at the marina, including the owners of smaller boats, would make the following choices; 1) decide to relocate to other portions of the marina once renovations are complete, 2) decide to use the renovated boat hoist in the East Harbor for put-in/take-out if their boats are of trailerable size (i.e. 25 ft. or less), or, 3) seek other berthing (or put-in/take-out) opportunities elsewhere in the Bay Area.

COMMENT 3.16

p. III.A-9 refers to Table 1 on p. II-9 (not p. II-8, as the footnote states). The statement that the “most noticeable change in berth size occurs in berths of this size,” is misleading because the larger 35 ft and 40 ft berths are actually increasing by 166 berths. The number of 30 ft berths is being decreased by 26 slips. This manipulation of numbers serves to mask the unwarranted elimination of small berths and is common throughout the document. (*Sue Chang, January 19, 2006*)

Response 3.16

Table 1 begins on DEIR page II-8, and continues on to page II-9. This table identifies the number and percentage of slips by length, under both existing and project conditions. The footnote is intended to further clarify the range of berth sizes that would be changed under the proposed project, and is not intended to conceal project information. The DEIR evaluates the potential environmental effects associated with the proposed change in boat size, assumed to correlate with berth size, from an average of 32 feet to an average of 38.5 feet.

COMMENT 3.17

Inconsistent: p. II-13 states “The East Harbor restrooms would be expanded and/or renovated for ADA compliance. They are intended for the use of boaters only, similar to the West Harbor restrooms and showers.” (*Sue Chang, January 19, 2006*)

Response 3.17

The sentence refers to the proposed renovations to the existing restrooms within and adjacent to the Harbor Office in the West Harbor, not the “West Harbor Restrooms” adjacent to Lyon Street in the far western portion of the project site.

COMMENT 3.18

The DEIR does not accurately represent the proposed renovation’s cumulative effects on the character of the project site. (*Sue Chang, January 19, 2006*)

Response 3.18

The proposed project’s cumulative effects on land use, including neighborhood character, are described on page III.A-11. No significant cumulative impacts to neighborhood character resulting from the proposed project were identified.

COMMENT 3.19

The DEIR states that the proposed Project will construct a public-access path along 500 feet of existing (East Harbor) breakwater. The DEIR thus implies that this breakwater is currently closed to public access. This may be inaccurate. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 3.19

The East Harbor breakwater is currently closed to public access, as evidenced by the chain link fence and locked gate at the entrance to the breakwater.

4. VISUAL AND AESTHETIC RESOURCES

COMMENT 4.1

Because of the north/south orientation of this mole and the ability to overlook the west harbor toward the Golden Gate Bridge, the views can’t be replaced and its removal will result in a significant impact to the San Francisco Marina. (*Sue Chang, Public Hearing Transcript, October 6, 2005*)

Question: Please evaluate the loss of use of and views from the north-south orientation Scott Street mole. (*Sue Chang, January 19, 2006*)

Response 4.1

DEIR Section III.B, Visual and Aesthetic Resources, provided six representative views of the project site, selected by Planning staff and its consultants. While views overlooking the West Harbor and the Golden Gate Bridge in the distance are available from the north-south mole, similar views are available from many other publicly accessible areas within the project site, including those shown in Viewpoints 4, 5, and 6 on pages III.B-11, B-14, and B-15. Similar views are also available outside the project area from the Saint Francis Spit. CEQA requires an assessment of whether a project would substantially degrade or obstruct scenic views, or substantially degrade the visual character or quality of the area. While removal of the north-south mole would eliminate one publicly accessible area on the project site that currently affords views of the West Harbor and the Bay beyond, this action would not substantially degrade or obstruct a publicly accessible view, or demonstrably degrade the visual character or quality of the area. The DEIR states that “short-range views could reflect the larger craft that may moor in the marina under project conditions, but mid-range views of Fort Mason and long-range views of the Golden Gate Bridge, Angel Island, Alcatraz Island, and the Marin Headlands would remain essentially the same. For these reasons, the proposed project would not substantially degrade or obstruct any scenic views from public places” (page III.B-17).

The marina is in area that is especially rich in visual resources. The DEIR acknowledges that some individual views may be altered by the proposed project, but the overall visual quality and character of the area would not change substantially as a result of the proposed project. It states that, “the project would alter some short- and long-range views from public viewing locations on the site and in its vicinity, including views from the Marina Green, Fort Mason, and neighboring streets. However, the site’s use as a harbor and its associated maritime character would continue under project conditions. Moreover, the project’s proposed public-access improvements could enhance the character of the site and its surroundings by allowing for greater access to portions of the site that are currently not available, such as on the East Harbor breakwater. Additional public access would be available on the public launch area of the docks. This improved access could allow for greater public enjoyment of the site and surroundings, providing additional opportunities for scenic vistas from areas not currently accessible to pedestrians” (page III.B-17). The components of the proposed project may alter some aspects of the views at the marina, but would not substantially degrade or obstruct scenic views, or substantially degrade the visual quality of the area. In accordance with General Plan policies cited in the DEIR, Section III.A.3-4, the project would continue to provide visual access to the water and would protect major views of open space and the water. Therefore, the DEIR appropriately concludes that the proposed project would have no significant visual or aesthetic impacts.

COMMENT 4.2

There is no evaluation of the views looking back to the city and toward the Marina Boulevard homes from the Saint Francis Spit. This is all open water now. This is where the proposed breakwaters will go. Over 350 feet of breakwaters will be in that area. And I am not the only one who thinks this is an important view. (*Sue Chang, Public Hearing Transcript, October 6, 2005*) Why did the Draft EIR

disregard the views of the thousands of visitors who come to this park? Also, please evaluate the views of the City and Fort Mason, looking from the West and Northwest shoreline that would be blocked by this new construction. (*Sue Chang, January 19, 2006*)

Please evaluate the loss of views from the park visitors' perspective. Evaluate the impact to views from the tip of the St. Francis spit and the Wave Organ looking South to the neighborhood, the Palace of Fine Arts and beyond, include views from adjacent properties, such as the hills of Fort Mason and the view corridor of Fillmore Street. Evaluate each location from 360 degree views because the greatest impacts will be to park users who are at ground level. (*Sue Chang, January 19, 2006*)

Response 4.2

Views of the West Harbor and the Marina District are available from the Saint Francis Spit looking south, as well as views of the City and Fort Mason looking east. While such views would be altered with the addition of two new breakwaters and new/reoriented slips and docks, substantially similar views would remain. Therefore, it cannot be concluded that these project components would substantially degrade or obstruct a publicly accessible view, or demonstrably degrade the visual character or quality of the area. Please see Response #4.6 for more discussion of the effect of boat types on views.

COMMENT 4.3

The comment in the EIR is that it [proposed maintenance building] really doesn't affect the view because the view is obstructed by trees anyhow. Now, I'm not quite sure how environmentally trees look the same as a building. (*Alan Silverman, Public Hearing Transcript, January 12, 2006*)

The statement on page III.B-8 above also implies that, as the current view is partially obscured by trees, having it obscured by a building is no worse. Is open space controlled by the Recreation and Park Commission not better filled with trees rather than buildings, even if the trees partially obscure the view of the Bay? (*Alan Silverman, Marina Community Association, January 18, 2006*)

The Draft EIR's contention that the view of Tiburon is already partially blocked by the trees that will be obscured by the proposed building (III.B-8) is disingenuous. There is a vast aesthetic difference between views of grass and distant trees and a close up view of a maintenance building. The argument that there already is a building, the public restrooms, on the space and therefore the open space is already degraded is similarly flawed. The restroom building is sited on the far corner of the space abutting the parking lot, and does not dominate the space as would the proposed maintenance building. Were the proposed maintenance building constructed, it would be the dominant view out of the living room windows of the Marina Blvd. homes across the street from the East Harbor open space. It would also be an eyesore to pedestrians and users of the open space. (*Michael Spiegel, September 27, 2005*)

The proposed maintenance building will substantially degrade and obstruct publicly accessible scenic views, substantially degrade the existing visual character and quality of the area, and will result in a substantial demonstrable negative effect. (*Michael Spiegel, September 27, 2005*)

The maintenance building in the east harbor area will block views from the trail to the bay. (*Maureen Gaffney, Public Hearing Transcript, January 12, 2006*)

Response 4.3

DEIR page III.B-9, Figure 6B, provides a visual simulation of the proposed maintenance building in the East Harbor open space area. As this simulation shows, the proposed building would be located on a site where views of the boats and distant hills are obstructed by the restroom building and trees. DEIR page III.B-8 states, “the proposed location of the maintenance building in front of tall trees and adjacent to existing structures would not substantially degrade or obstruct any scenic view now observed from public viewpoints. The view is partially obstructed under existing conditions, and under project conditions the trees and other buildings adjacent to the maintenance building would continue to obstruct views of Tiburon and the Marin Headlands in the distance, though the view blockage would be slightly greater due to the new maintenance building. The existing marina facilities would continue to be visible under the proposed project.” While views of trees may be preferable to views of a building, views from this area looking toward the Bay are partially obstructed under existing conditions. The proposed building is therefore not blocking an existing view or degrading the overall visual character of the marina setting. Therefore, the DEIR appropriately concludes that, “Although visual quality is subjective, it can reasonably be concluded that the proposed project would not result in a substantial, demonstrable negative aesthetic effect on the visual character or quality of the area and its surroundings.”

With regard to views from homes and pedestrian and user areas along Marina Boulevard, the DEIR acknowledges that the views would change, but not to such a substantial degree as to constitute a significant impact under CEQA. The overall visual character of the marina would not be substantially affected by the proposed building, nor would the building block existing views. Thus, the addition of the building would not be considered a significant impact on these private views.

With regard to the comment about potential view blockage from the proposed maintenance building on views from the Bay Trail, this trail follows the sidewalk on the northern edge of Marina Boulevard, about 200 feet south of where the proposed maintenance building would be located. (See also Response #9.1 regarding Bay Trail compatibility concerns.) DEIR page III.B-9, Figure 6B, provides a visual simulation of the proposed maintenance building from this sidewalk along Marina Boulevard, approximating views that Bay Trail users would experience under project conditions. As described in DEIR page III.B-8, “the proposed location of the maintenance building in front of tall trees and adjacent to existing structures would not substantially degrade or obstruct any scenic view now observed from public viewpoints. The view is partially obstructed under existing conditions, and under project conditions the trees and other buildings adjacent to the maintenance building would continue to obstruct views of Tiburon and the Marin Headlands in the distance, though the view blockage would be slightly greater due to the new maintenance building. The existing marina facilities would continue to be visible under the proposed project.”

While no significant visual impacts of the proposed maintenance building were identified in the DEIR, due to the concerns raised about visual changes to the East Harbor open space area, the

following improvement measure about selection of an appropriate location for the proposed maintenance building has been included in Section D, Staff Initiated Text Changes:

Improvement Measure VIZ-1 – Location of Maintenance Building

“Select a location for the maintenance building that maximizes both preservation of the existing open space and protection of existing views. Work with the community to identify the preferred location for the structure.”

COMMENT 4.4

Secondly, just in regard to the maintenance building but not the same issue my neighbors have brought up, this is what the existing P.U.C. building looks like. ...The building here, this is the kind of crud they store outside of it. The photo simulation isn't accurate. There is an old boat gate there. There is new docks that they're working on. I think a photo simulation should be redone. (*Sue Chang, Public Hearing Transcript, January 12, 2006*)

Please evaluate the additional impacts of large harbor vehicles and the storage of materials outside of the buildings in the photo simulations of the proposed maintenance building and Harbor Office. Evaluation should also include a photo simulation depicting the removal of the Degaussing Station and return of the site to shoreline open space. (*Sue Chang, January 19, 2006*)

Response 4.4

The commenter asserts that the photo simulation provided in the DEIR is inaccurate because it does not depict surrounding uses such as driveways, vehicles, and materials storage similar to what is currently seen at the SFPUC building used for harbor maintenance. The project sponsor does not plan to construct a new driveway to access the proposed maintenance building or provide temporary parking adjacent to the building, as sufficient parking spaces are provided immediately east of the facility in the East Harbor parking lot. The sponsor could also choose to locate the shed closer to the existing parking area if that is determined to be a more desirable option for the project sponsor and for the community. Materials storage would occur within the proposed maintenance building, not outside of it. However, if such uses were to occur, they would be temporary in nature, and therefore, would not substantially degrade the visual character of the area on a permanent basis.

A photo simulation of proposed changes to the former Degaussing Station is included in Figure 7, page III.B-10. Because the proposed project would maintain and renovate this building, no simulation showing this building's removal or return to open space was provided in the DEIR. A discussion of the removal of this building, and a return of this area to open space, is provided in Section VI, Alternatives, Alternative D.

COMMENT 4.5

It is not appropriate to judge visual impact by measuring the footprint of a building. In an attempt to justify the statement that the view blockage would only be slightly greater, the DEIR (at page III.A-10) purports to calculate the percentage by which the footprint of the new building will reduce the open space

in the East Harbor. Firstly, the calculation is arithmetically wrong. The correct answer is 2% - not 0.02% as quoted. One can only hope that the arithmetic in other parts of the DEIR is more accurate. But measuring the visual impact by calculating the square footage used by the building would only be relevant if you were in a helicopter and viewing it from above. (*Alan Silverman, Marina Community Association, January 18, 2006*)

Response 4.5

The visual impact of the proposed maintenance building was evaluated from a publicly accessible viewpoint adjacent to Marina Boulevard (see viewpoint location #2 on Figure 4, Viewpoint Location Map, page III.B-5) as well as through the use of visual simulations, which employed photographs taken at human eye level (see Figure 6, Existing and Proposed Views from Viewpoint Location 2, page III.B-9). The evaluation identified the potential for the proposed structure to substantially degrade or obstruct publicly accessible scenic views, or substantially degrade the existing visual character of the area. The size of the proposed building, expressed as a percent of the total acreage of the East Harbor open space area, was used to evaluate the potential land use effects (i.e., loss of useable open space, change or restriction of use, etc.), as described in Section III.A, Land Use Plans and Policies.

Please see Section D of this document, Staff Initiated Text Changes, for clarifications regarding the size of the proposed maintenance building in relation with the size of the East Harbor open space area.

COMMENT 4.6

However, I believe that the Draft EIR does not adequately address concerns with the Visual and Aesthetic Resources. Specifically, In Figure 8, showing proposed Views from Viewpoint Location 4, all of the boats pictured are low profile sailboats. Unless there are guarantees that no powerboats, which can have side profiles 4 - 5 times the height of similar length sailboats, will be berthed in this area this photo is misleading and can not be used as a legitimate example of the proposed view. (*Greg Milano, October 18, 2005*)

The panoramic nature of the simulation does not depict the actual view from the pedestrian promenade. The photo shows sailboats but there may be power boats, several decks high, blocking views of the St. Francis spit, the bay and beyond to Tiburon and Sausalito. (*Sue Chang, January 19, 2006*)

Question: Is the yacht occupying a 60 ft berth in the outermost portion of the Outer West Harbor more likely to be a sail boat, with less visual impact on the site or a power boat with several deck heights which will have a significant negative impact on the mid and long range views? (*Sue Chang, January 19, 2006*)

The DEIR inadequately considers the loss of public open water views currently enjoyed from the Marina Green and from points along the Fair's Seawall, as well as views from the jetty looking south across the Outer Basin toward the Green and toward the Fair's Seawall that will result from the berthing and the east-west orientation of the large yachts with superstructures rising perhaps 30 feet above the water. How can we reasonably predict that these will be power boats with large superstructures and not sailboats with

thin masts? Because there are precious few 60 foot sailboats on the Bay, and because oily water pump outs are not needed for sailboats. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Further, the photomontages intended to show Project impacts on views, while they show the higher mast heights expected under the proposed project, do not show the increased height of the decks and other superstructure in the larger boats proposed as part of the project. Again, the Sierra Club's prior comment letter provided some examples of how larger boats tend to have higher decks and cabin superstructure. The EIR should be revised so that the photomontages accurately reflect the effects of these taller vessels on views. (*Stuart M. Flashman, October 25, 2005*)

Response 4.6

The comment asserts that the photosimulations do not provide views of power boats which could berth in these areas of the marina. The simulations visually portray power boats as well as sailboats at roughly the same proportion as would be found under existing conditions, (i.e. images of powerboats occurring about one-third as often as sailboats, similar to existing conditions). The boats in the simulations are rendered to be somewhat larger and taller than existing boats at the marina to reflect the anticipated increase in the average length of slips that are assumed to correlate with larger boats. Simulated images of typical power boats are visible in the immediate foreground of the shot, as well as in the background.

The comments refers to DEIR page III.B-11, Figure 8B, providing a simulated panoramic view of the outer basin of the West Harbor from the Fair's Seawall looking north. As described on DEIR page III.B-12, "Boats are a component of the existing visual landscape at the marina, and the potential increase in boat size (on average about 6.5 feet in length) would not substantially change the visibility of boats at the project site. For this reason, the addition of longer and/or larger boats at the marina after renovation would not substantially degrade or obstruct any scenic view, nor alter the overall maritime character of the project site or its surroundings. The presence of larger or longer boats in marina slips would continue to allow for long-distance views through boats at the marina to nearby locations, and long-distance views of the marina would appear essentially the same as under existing conditions." Therefore, the DEIR appropriately evaluates the potential visual and aesthetic effects of the proposed project, including potentially larger power boats which could berth at the marina.

Views from the jetty looking south across the Outer Basin toward the Marina Green and toward the Fair's Seawall would be substantially similar to those shown in page III.B-11, Figure 8B, of the DEIR, except with the Marina Green in the background instead of the Bay.

COMMENT 4.7

Secondly, I am extremely concerned about the existence of at least two visible "side" or "end" ties in this photo which are shown as unoccupied. My experience with other harbors is that these end ties are often used for the mooring of mega yachts exceeding 100 feet in length and up to 30 feet high. At this time,

examples of this are the two mega yachts “Ronin” and “Invader” currently tied at Schoonmaker Marina in Sausalito. Even if these types of docks are classified as Docks”; unless there are going to specifically stated and enforced prohibitions against the use of these side ties for such boats this photo is again inaccurately misleading and cannot be used as a valid example of the proposed views. (*Greg Milano, October 18, 2005*)

Response 4.7

The comment refers to DEIR page II.B-11, Figure 8B, a simulated panoramic view of the outer basin of the West Harbor from the Fair’s Seawall looking north. This simulated view does not include images of boats tied up to the proposed guest docks (shown in the far right of the photo), as these areas would be for public hand boat launches and temporary guest dock use only (see Figure 3, Proposed Site Plan, page II-7). The simulations were meant to show the marina in its typical state before and after completion of the proposed project. As these areas would not be used for berthing on a permanent basis, images of boats were not included in the simulated view. Regardless, when guest boats tie up to these areas temporarily, views of boats from public viewpoints would be considered typical for a marina setting, and would not substantially obstruct scenic areas or demonstrably degrade the visual character of the area. Therefore, the DEIR appropriately evaluates the potential visual and aesthetic effects of the proposed project.

COMMENT 4.8

The Club wishes to comment additionally and in more detail on the DEIR’s analysis of visual impacts. The DEIR includes several panoramic view photographs which purport to show current views from the Marina area, along with photomontages based on those photographs which purport to show the effects of the proposed project on those views. However, as the DEIR notes in a footnote, the panoramic photographs are subject to “barrel distortion”, making those objects located near the far end of the view appear smaller, and those near the center appear larger. The result is that the photographs are not accurate representation of what an observer at the Marina would actually see. In particular, Figures 8A and B include a view of the Golden Gate Bridge, but because the bridge image is located near the far end of the photograph, that view is not given its proper significance. Further, because the photos were all only done in black and white, the prominent red coloring of the bridge does not stand out as it would to a real observer. Consequently, the DEIR has badly understated the view impacts of the proposed project on this view. The Sierra Club’s comment/appeal letter on the prior proposed mitigated negative declaration included a photograph from the Marina (near the site labeled “View 4” in Figure 4) looking towards the Golden Gate Bridge. That photograph more accurately shows the significance of the view. The EIR should be revised to include a photo accurately showing how the Golden Gate Bridge currently appears to observers at the Marina, and the effects of the Project on those views. (*Stuart M. Flashman, October 25, 2005*)

Response 4.8

As described above, DEIR Section III.B, Visual and Aesthetic Resources, provided six representative views of the project site, selected by Planning staff and its consultants. In order to

provide the widest possible views of the project area, wide angle lenses were utilized for Figures 5, 6, 8, and 9 to create panoramic montages which have a certain degree of ‘barrel distortion’ inherent in the use of such lenses. As the commenter notes, the Golden Gate Bridge is a much more prominent visual feature in reality than it seem in Figures 8A and 8B. The use of such panoramic shots is not intended to deceive the reader through ‘barrel distortion,’ but rather, to provide as much visual information in one picture as possible. Black and white photography was selected due to the lower costs of black and white reproduction, typical for most EIRs.

CEQA does not require a visual impact assessment, or visual simulation, from every possible location of proposed change. Rather, it requires an assessment of whether a project would substantially degrade or obstruct scenic views, or substantially degrade the visual character or quality of the area.

COMMENT 4.9

It should be noted that even with the distorted panoramic view provided in the DEIR and the failure to take into account the larger boats’ taller superstructures, the photomontage in Figure 8 still appears to indicate that the Golden Gate Bridge would no longer be clearly visible under the project scenario, but would have its view obstructed by numerous masts. This should have been disclosed as a significant visual impact. As mitigation, the EIR should discuss reconfiguring the locations of larger boat docking areas to locate them away from this and other significant views. (*Stuart M. Flashman, October 25, 2005*)

Response 4.9

Figure 8B on page II.B-11 provides a visual representation of potential views under project conditions, including views of the Golden Gate Bridge in the background (as seen in the far left of the figure), as well as numerous masts from sailboats. While the simulation shows a greater number of masts than under existing conditions, this would not substantially obstruct views of the Golden Gate Bridge, as the bridge would continue to be visible under project conditions. Currently, the boats docked at the marina prominently occupy the foreground of the view, as they would continue to do under the proposed project. Therefore, the DEIR appropriately evaluates the potential visual and aesthetic effects of the proposed project.

COMMENT 4.10

Proposed plan would remove cobble stone walls and replace with vinyl docks like generic harbors destroying environmental quality. Was there any effort to look at other options? Why photos in this EIR are shot on [sic] inch from the ground escapes me. Why are the ‘real views’ not shot. Views of the bridge from the Marina green but most important where are the views from boats as they enter harbor. This is a view more relative to the project. (*Will LeRoy, undated*)

Response 4.10

The visual and aesthetic effects of the proposed project are evaluated in DEIR Section III.B, Visual and Aesthetic Resources. While exact materials for the slips and docks have not been selected as

their design has not been finalized, the photo simulations provided in this section of the DEIR show a wood planking, similar to existing slip and dock materials. It is assumed that the “cobble stone walls” that the commenter references are the marina’s seawalls, which would not be removed with the proposed project. The project proposes removal of the existing moles and creation of new breakwaters. The simulations depict rock-filled breakwaters, although as with the slips and docks, final selection of materials has not yet taken place.

Figures 5 through 10 were shot using a tripod mounted approximately 5 feet off the ground to approximate human eye-level views. All six viewpoints were selected by Planning staff and its consultants to represent publicly accessible landside areas where the greatest number of viewers are located, such as from the Marina Green, Marina Boulevard, etc., looking generally north toward the primary views of the Bay and viewpoints beyond. CEQA does not require a visual impact assessment from every possible location of proposed change. While views of the West Harbor and the Marina District are available to boaters as they enter or leave the harbor, these views are less common than landside views, and were therefore not selected for representation in the EIR.

COMMENT 4.11

As it pertains to blocked views of the Golden Gate bridge from the marina, Marina neighbors and Marina Boulevard how is the environment made equal or better? (*Will LeRoy, undated*)

Response 4.11

CEQA requires an evaluation of whether a proposed project would substantially degrade or obstruct scenic views, or substantially degrade the visual character or quality of the area, when compared with existing conditions. The proposed project was evaluated against these thresholds, as described in Section III.B, Visual and Aesthetic Resources. Views of the Golden Gate Bridge, the Marina Green, and Marina Boulevard are provided in Figures 5 through 10 of the DEIR. The DEIR appropriately concluded that the proposed project would not substantially degrade or obstruct scenic views, or substantially degrade the visual character or quality of the area.

COMMENT 4.12

Question: Please include 55+ ft power boats and sheet pile breakwaters in the photo simulation. This would be the “worst case scenario.” (*Sue Chang, January 19, 2006*)

Response 4.12

Although not shown in the DEIR simulations, a metal sheetpile-type breakwater could be chosen instead of the rock-filled type. As described on page II.B-12 – 13, “The type of material would be determined during the project design phase, but would likely consist of materials present at the existing sheetpile breakwater in the East Harbor, such as thin, corrugated-steel sheeting with a concrete cap. Sheet-metal-type breakwaters might be less visually consistent with the rock-faced seawall and outer jetty than rock-filled breakwaters, but would be no taller or longer than rock-filled breakwaters and would not obstruct views of the Bay, Golden Gate Bridge, or other long-

range views. Sheetpile breakwaters could actually be less visually apparent than rock-filled breakwaters, due to their smaller footprint. Regardless of which type of breakwater is ultimately constructed in the West Harbor, no substantial adverse impacts to views or visual quality are expected.” See also Response #4.6 regarding powerboats in the photosimulations.

COMMENT 4.13

Page II -9 Table 1 Proposed Waterside Improvements is written in an attempt to minimize impacts. Table 1 shows changes to aspects of the marina ranging from about 15% to over 25% for floating dock coverage. This constitutes a large visual impact. In addition, the table infers but does not clearly state that the “improvements” result in a loss of 94% of slips for boats 25 feet and shorter. This is a very large impact which goes against the history and recreational uses of the facility. Table 1 should be corrected to fully describe the visual and recreational impacts. (*Howard Strassner, Sierra Club San Francisco Group, January 17, 2006*)

Response 4.13

DEIR Section III.B, Visual and Aesthetic Resources, evaluates the proposed project’s potential visual and aesthetic impacts, including the mooring of potentially larger boats at the marina. The DEIR states that, “... the project would reorient the boat slips from north-south to east-west, and new slips would be added in portions of the outer basin where none currently exist. The visibility of the boats would slightly intensify, given that longer boats with taller masts or superstructures could be moored here. However, the overall number of boats moored in the West Harbor of the marina would be generally similar to existing conditions, and the total number present would fluctuate on a daily basis, as is currently the case. Boats are a component of the existing visual landscape at the marina, and the potential increase in boat size (on average about 6.5 feet in length) would not substantially change the visibility of boats at the project site. For this reason, the addition of longer and/or larger boats at the marina after renovation would not substantially degrade or obstruct any scenic view, nor alter the overall maritime character of the project site or its surroundings. The presence of larger or longer boats in marina slips would continue to allow for long-distance views through boats at the marina to nearby locations, and long-distance views of the marina would appear essentially the same as under existing conditions.” As such, the DEIR appropriately concluded that the increase in boat size resulting from the proposed project would not have a significant adverse impact on visual or aesthetic resources. Please also see Response # 2.2 related to vessel mix and slip sizes.

With regard to the comment about the proposed increase in floating docks, Table 1 estimates that the proposed project would increase the existing linear feet of floating docks (21,280) by approximately 3,335 linear feet, for an increase of about 15% in floating dock coverage of open water. This increase in floating docks would be spread throughout the entire 39-acre property, including both harbors located nearly 1/3 mile apart, and as such, would not be immediately perceptible to the average park user as a substantial increase in the amount of floating docks (or, conversely, as a substantial decrease in open water). Therefore, the DEIR accurately characterized

the impacts to visual resources as a less-than-significant impacts, including impacts from increased floating docks.

COMMENT 4.14

In assessing visual and aesthetic resources, impacts from Fort Mason, just not mid-range views of Fort Mason, should also be examined. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 4.14

As described above, CEQA does not require a visual impact assessment from every possible location of proposed change. Rather, it requires an assessment of whether a project would substantially degrade or obstruct scenic views, or substantially degrade the visual character or quality of the area. While portions of the project area are visible from Fort Mason, the six views provided in the EIR were selected as typical, representative views from publicly accessible locations in the project vicinity by Planning staff and its consultants.

While the DEIR identified no significant visual or aesthetic impacts to Fort Mason resulting from the proposed project, the Department of Recreation and Park has agreed to implement design guidelines intended to preserve existing views and manage the massing, scale, site coverage, articulation, and character of new development at the marina. These guidelines are described as Improvement Measure HIST-1 (see Chapter IV, Mitigation and Improvement Measures, p. IV-6). The design guidelines, which are listed in Appendix B, seek to maintain the distinctive maritime-industrial character of the San Francisco Port of Embarkation National Historic Landmark District at Fort Mason. The guidelines have been prepared with input from the National Park Service/Golden Gate National Recreation Area and are generally consistent with the *Secretary of the Interior's Standards (Standards)*. Therefore, the DEIR appropriately concluded that the proposed project would have no significant adverse impacts to visual and aesthetic resources, including off-site or adjacent uses.

COMMENT 4.15

Question: Please evaluate the impacts of locating the Harbor Office, along with harbor vehicles and increased parking and traffic in the center of the Fillmore view corridor and public open space along the shoreline. (*Sue Chang, January 19, 2006*)

Response 4.15

The visual and aesthetic effects of renovating the former Degaussing Station for use as a new Harbor Office are addressed in DEIR pages III.B-8 and 9, including analysis of simulated views from publicly accessible viewpoints. There is an existing parking area adjacent to the Degaussing Station site. The proposed project would not change the number of parking spaces adjacent to the former Degaussing Station, nor would the addition of two employees (the Harbormaster and office staff) or visitors to the office create a substantial parking or traffic impact in this vicinity.

5. HISTORIC RESOURCES

COMMENT 5.1

Construction of the seawalls and an ADA ramp, a new floating dock is determined it could potentially damage or substantially alter the Fair's seawall, including its sloped cobblestone face and possibly one of its stone staircases, both of which are considered character defining features. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

The seawall has been determined to be historical. We should do everything possible to protect its historical significance. (*Sue Chang, January 19, 2006*)

Response 5.1

These potentially significant impacts to the Fair's Seawall are identified on DEIR page III.C-8. As stated on this page, "Mitigation Measure HIST-1 requires that the new West Harbor breakwater and access ramps be designed in accordance with the *Standards*, which would reduce the impact to a less-than-significant level (see Chapter IV, Mitigation and Improvement Measures, p. IV-2). In accordance with the *Standards*, the breakwater should be designed so that it is compatible with the historic seawall (in terms of materials, massing, and scale), yet clearly differentiated from the seawall (in terms of design). Also, the new breakwater and access ramps would need to be constructed so that, if removed in the future, they would not damage the seawall structure or its cobblestone facing." Implementation of Mitigation Measure HIST-1 would reduce this potentially significant impact to a less than significant level.

COMMENT 5.2

What I'd like to do is, to refer the historical issues to our own Landmarks Board and have them take a look at it. In section III.C-7 you mentioned here there is a rating of 7-J. It was received by the State Office of Historical Preservation but not yet evaluated for the NRHP. But I think more importantly, to reset the process and go through our own Landmarks Board to see if the seawalls are historical or what level of historical it should be. (*Commissioner Bill Lee, Public Hearing Transcript, October 6, 2005*)

Response 5.2

A public hearing was held at the regularly scheduled meeting of the Landmarks Board on October 5, 2006 to discuss proposed project's potential effects on historic resources. At the hearing, Board President, Bridget Maley, stated that the Board would submit written comments to the Planning Department. A written comment from the Landmarks Board was received by the Planning Department on October 14, 2005. Please refer to Comment 5.11 and the associated response.

The DEIR concludes that the Fair's Seawall is an historic resource for the purposes of CEQA and therefore evaluates the proposed project with regard to minimizing potential adverse effects to it. Any impact to a resource with any rating must be addressed, which is done through Mitigation Measure HIST-1. The comment also refers to a rating of "7J," which is for the Palace of Fine Arts,

a historic resource in the vicinity of the proposed project. This building is San Francisco Landmark #88 and was rated “7J” by the State Office of Historic Preservation, meaning that it has not been evaluated for the NRHP or the CRHR. Nonetheless, for CEQA purposes, this structure is considered a historic resource due to its listing on the local register as a San Francisco Landmark. DEIR page III.C-12 identifies the Palace of Fine Arts as a historic resource in the project vicinity, and provides an evaluation of the project’s potential impacts to this facility. As stated in the DEIR, “The overall degree of visual change in this area would not be sufficient to cause a significant impact to the historic setting of the Palace of Fine Arts, such that it would no longer qualify as a San Francisco Landmark. Therefore, the proposed project would have a less-than-significant impact on the setting of this historic resource.”

COMMENT 5.3

On page 87 it is noted that the San Francisco Yacht Club constructed the Club in 1927 on the St. Francis Spit. Please note that the St. Francis Yacht Club built the Clubhouse in 1927 as it spun off from the San Francisco Yacht Club, which was then based in Sausalito and bound for Belvedere. A significant reason for the split and relocation of the new St. FYC to the City was the presence of deeper water and a proper harbor with enough room for the St. FYC’s members’ larger boats. (*Richard H. Robinson, September 6, 2005*)

Response 5.3

Comment noted. The comment refers to DEIR page III.C-1, last paragraph. For informational purposes, proposed dredging operations to maintain harbor depth are discussed in the Project Description (DEIR Section II).

COMMENT 5.4

DEIR p. S-8. The proposed breakwater is to be constructed so that it ties into the Fair’s Seawall and, with the removal of the Scott Street mole, another portion of the Fair’s Seawall will be impacted. “Damage or substantial alteration to a historically significant resource is considered a potentially significant impact under CEQA.” DEIR p. S-9. What does the DEIR propose to do about these significant impacts to the Seawall? Nothing! All the DEIR proposes is to study the matter further during design, use standards during construction and submit additional reports. DEIR p. IV-2. The DEIR is supposed to address environmental impacts, not consider them at some future date. (*Ronald J. Mulcare and Edward J. Barrett, September 27, 2005*)

Response 5.4

The passage of the DEIR that the comment references describes potential impacts to the historic resource (the Fair’s Seawall) from the proposed new breakwater and ADA-compliant ramp. The DEIR identifies a mitigation measure (HIST-1) for this potentially significant impact, which would involve designing these project components in accordance with the *Secretary of the Interior’s Standards for Historic Preservation*. These standards are meant to ensure that construction does not damage or substantially alter those characteristics of a resource which are germane to its historic

importance. In using the standards, the impacts to the historic resource are eliminated or reduced to a less-than-significant level.

As described on page III.C-5 “The north-south mole, in particular, is a much later addition to the West Harbor, and its removal from the face of the Fair’s Seawall would help to restore this historic resource more closely to its original WPA-era appearance. Therefore, removal of this mole itself would not adversely affect the historic integrity of the Fair’s Seawall.” Page III.C-9 of the DEIR states that neither the north-south nor east-west moles in the West Harbor were identified as historic resources in the historic resources evaluation report prepared for this project (Carey & Co., 2004). Therefore, the proposed removal of the north-south mole would be a less-than-significant impact to historic resources under CEQA’.

Page III.D-13 of the DEIR states that removal of the mole at the foot of Scott Street would expose a portion of the Fair’s Seawall to wave action. According to the engineering report, both the northeast and northwest wind-wave heights could slightly increase at the location where the mole would be removed. Although the exposure to wave action would not likely be sufficient to make the seawall more susceptible to failure or earthquake damage, because it is unknown how the exposed portions of the wall would be strengthened once the mole is removed (again, because the project design has not been finalized), damage could occur to the seawall, which would be a significant impact. Mitigation Measure GEO-2 requires that the newly exposed portion of the seawall be inspected during construction, that toe protection similar to what exists along the rest of the seawall be installed, that periodic inspection be conducted for structural defects in the vicinity of the mole removal, and that any identified defects be repaired promptly. Implementation of Measure GEO-2 would reduce potential impacts to the seawall from wave action to a less-than-significant level.

Mitigation Measures HIST-1 and GEO-2 will be incorporated into the final designs of the proposed project to ensure that any potential impacts to the Fair’s Seawall would be reduced to a less-than-significant level. Aside from removal of the north-south mole and attachment of the proposed southernmost breakwater in the West Harbor, no other project components would potentially affect the historic significance of the Fair’s Seawall.

COMMENT 5.5

The DEIR as written is an attempt to change the history as well as the name of the facility. The title of the project and Historic Resources section of the EIR, III.C-2 should be changed to show the proper name of the facility and also state that all of the 1966 improvements were funded by a low interest loan from the State. Quarterly invoices and the recent notification of berth fee increases are headed by the proper name of the facility, “San Francisco Marina Small Craft Harbor”. (*Howard Strassner, Sierra Club San Francisco Group, January 17, 2006*)

Response 5.5

As stated in the DEIR, page III.C-2, “In 1963, the state legislature approved the conveyance of three parcels of state-owned land to the City and County of San Francisco, generally encompassing

the land and water north of Marina Boulevard from Laguna to Lyon Streets, including the entire West Harbor, East Harbor, and the Marina Green. Between 1964 and 1966, the Department of Recreation and Park completed an extensive enlargement of the marina by constructing a new harbor at Gashouse Cove, now called the East Harbor, and by carrying out major repairs and improvements to the seawall and piers at the West Harbor. Construction was completed by March 1966, at which time the number of docking berths had been increased from 257 to 680, 329 of which were located at Gashouse Cove and 351 at the original (west) harbor.” As such, the DEIR appropriately identifies the date of improvements made to the marina.

The project title used in the DEIR, “San Francisco Marina Renovation Project,” refers to proposed renovations and improvements throughout the entire marina facility, include the West Harbor and the East Harbor. Regardless of the titles currently or formerly used to describe certain portions of the marina, the DEIR appropriately characterizes the proposed project’s physical effects on the environment in accordance with CEQA requirements.

COMMENT 5.6

As the City proceeds through design and construction drawing development, we request close coordination with the NPS so that park staff may provide review and comment on an ongoing basis. Issues of particular concern are as follows: arriving at a breakwater design that is compatible with the San Francisco Port of Embarkation National Historic Landmark district; situating improved trailer boat storage in such a way that it does not crowd the historic wall north of the Lower Ft. Mason entrance gate, nor introduce conspicuous non-historic features that would detract from this historic entry point. (*Brian O’Neill, U.S. Department of the Interior, January 19, 2006*)

Response 5.6

The Department of Recreation and Park intends to fully cooperate with the NPS with regard to the design and construction of the proposed project. As described on page IV-6 of the DEIR (Improvement Measure Hist-1, East Harbor Design Guidelines), “The project sponsor (i.e., the City) shall work with the National Park Service/Golden Gate National Recreation Area (NPS/GGNRA) to implement the East Harbor Design Guidelines in order to maintain the distinctive industrial maritime character of the San Francisco Port of Embarkation Historic Landmark District. These guidelines, developed in collaboration among the NPS/GGNRA, the San Francisco Department of Public Works, and the preservation architecture firm Carey & Co., are intended to guide the design of proposed East Harbor elements in terms of materials, scale, texture, site relationships, color, architectural character, and views. The guidelines are consistent with the Secretary of the Interior’s Standards for Rehabilitating Historic Buildings and take into account the unique maritime-industrial character of Lower Fort Mason.” As such, the City intends to collaborate with NPS staff on design issues as they relate to improvements to the East Harbor.

COMMENT 5.7

Ft. Mason was used first as a military defense site by colonial Spain 200 years ago, and subsequently by the United States. Please make this distinction clear. Fort Mason became part of GGNRA in 1972. Change here and elsewhere in the document. The National Register status of Fort Mason is as follows: established as a historic district in 1972; district expanded in 1979; San Francisco Port of Embarkation National Historic Landmark established in 1985, including Lower Fort Mason, its three piers, and associated structures. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 5.7

DEIR page III.C-6, paragraph 2, has been revised to reflect the information provided in the comment. Please see Section D of this document, Staff Initiated Text Changes.

COMMENT 5.8

We recommend that the City of SF continue to publicly interpret the role that the Degaussing Station played in the defense of San Francisco Bay. In this it is thematically related to bay shore historic resources in Ft. Mason and the Presidio that are also publicly interpreted. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 5.8

As discussed on page III.C-5 of the DEIR, the Degaussing Station is not considered an historic resource for the purposes of this project and CEQA. However, the project sponsor intends to retain the signage adjacent to the Degaussing Station in order to continue to publicly interpret the role that the Station played in the defense of San Francisco Bay, and in its thematic relationship between Fort Mason and the Presidio.

COMMENT 5.9

My understanding, the Scott Street used to go straight through to the Golden Gate Yacht Club and I respectfully request that there be a review for the historic significance of this mole. (*Sue Chang, Public Hearing Transcript, January 12, 2006*)

The north-south orientation of the mole and the ability to overlook the West Harbor toward the Golden Gate Bridge cannot be replaced and its removal will result in a significant impact to the San Francisco Marina. Please review the impacts on public access and review the historical significance of the Scott Street Mole as it once extended all the way to the St. Francis Spit. (*Sue Chang, January 19, 2006*)

Although the DEIR chronicles the historic of the development of the Marina, it does not mention when the expansion to the outer West Harbor occurred. This is important because the St. Francis Spit was built to protect the inner West Basin. The spit was not intended to protect boats East of the Scott Street Mole because the wave action and surge is too great. The need for breakwaters to protect berths in the outer west harbor is directly related to the poor historical decision to develop the outer west harbor. Question: When was the "Outer West Harbor" developed, ie: when were berths added to the area east of the Scott

Street Mole? When was Scott Street shortened and when was the deck on the end of the mole built? Is there any historical significance to this? (*Sue Chang, January 19, 2006*)

Response 5.9

As described in the Historic Resources section of the DEIR, page III.C-2, “In 1958, construction was started to provide a new 100-foot-wide entrance channel for the (west) harbor by cutting into the embankment at the foot of Scott Street and building a rubble-filled, 1,100-foot-long breakwater (now called the outer jetty or north jetty) extending east from the former harbor entrance. Also see Response #5.5 regarding the history of the West Harbor improvements in the 1960s.

The eastern portion of the jetty was constructed to protect boats in Outer West Harbor from west and northwest-driven wind waves, but did not protect them as sufficiently from north and northeast-driven wind waves. As such, many of the slips in the Outer West Harbor have been lost over time due to storm damage and shoaling (DEIR, p. C.III-2). The proposed project would therefore construct two new breakwaters in the Outer West Harbor to protect boats and slips in this area from north and northeast-driven wind waves, and would replace many of the slips previously lost in this area (although considered and evaluated as ‘new’ slips in the DEIR). Section III of the DEIR, Environmental Setting and Impacts, evaluates the potential environmental impacts of the proposed project, including construction of slips and docks in the Outer West Harbor.

As described on page III.C-5 and page III.C-9 of the DEIR, neither the jetty nor the north-south or east-west moles in the West Harbor were identified as historic resources in the historic resources evaluation report prepared for this project (Carey & Co., 2004) or by the San Francisco Planning Department. Those elements of the project vicinity which are considered historic resources, and the reasoning behind these determinations, are identified and discussed in the DEIR (pp. III.C-5 – III.C-8). Therefore, the proposed removal of the north-south (Scott Street) mole would be a less-than-significant impact to historic resources under CEQA. Page III.C-5 states, “The north-south mole, in particular, is a much later addition to the West Harbor, and its removal from the face of the Fair’s Seawall would help to restore this historic resource more closely to its original WPA-era appearance. Therefore, removal of this mole itself would not adversely affect the historic integrity of the Fair’s Seawall. The east-west mole is a remnant feature from the Pacific-Panama International Exposition, but is not considered an individually eligible historic resource for this association. Its proposed truncation would be a less-than-significant impact under CEQA.”

COMMENT 5.10

A determination from the Landmarks Board that the Marina Green and the Fair’s Seawall are historic resources eligible for listing on the NRHP should be part of the EIR. There should be recognition in the EIR that the two together are the defining characteristic of the Marina District, as concluded in the Carey & Co. report of 2003. There should be more discussion in the EIR of the effects of West Harbor development expansion (visual and technical) on these historic resources. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 5.10

The historic resources evaluation report prepared by Carey & Co in 2004 found that the Marina Green and the Fair's Seawall are eligible for listing on the NRHP and CRHR. The report was reviewed by Kay Simonson, Preservation Technical Specialist at the San Francisco Planning Department, who confirmed the report's findings of historic significance of these and other resources on or near the project site. The findings were then summarized in the DEIR, and potential effects of the proposed project on these and other historic resources were analyzed (see DEIR pp III.C-8-10). The DEIR recognized both the Marina Green and the Fair's Seawall as historic resources within the marina vicinity (DEIR p. III.C-3 – 4).

These findings were confirmed by Planning staff and project effects to these historic resources were analyzed in the DEIR. The Landmarks Preservation Advisory Board (LPAB) does not also need to make a determination that the Marina Green and the Fair's Seawall are eligible for listing in the NRHP in order for them to be considered historic resources for the purposes of CEQA review. See also Response 5.11 regarding comments received by the LPAB on the adequacy of the DEIR.

The environmental effects of proposed changes to the West Harbor, specifically, on these historic resources are addressed in Section III, Chapter B (Visual and Aesthetic Resources), Chapter C (Historic Resources), and Chapter D (Geology, Soils, and Seismicity).

COMMENT 5.11

The Cultural Resource Evaluation Report dated December 2004, did not evaluate the residential buildings of the Marina District neighborhood for their potential as a [sic] historic resources with architectural and historical significance. The Board felt that due to the fact that the Marina District neighborhood (roughly bounded by Marina Blvd, Fillmore, Chestnut and Scott Streets) development began after soon after the 1915 Panama-Pacific International Exposition, a time of vast development in the area, that these houses should be evaluated collectively under the context of residential neighborhood development as a potential historic district. (*Bridget Maley, San Francisco Landmarks Preservation Advisory Board, October 14, 2005*)

Response 5.11

The historic resource evaluation report (Carey & Co., 2004) did not evaluate the marina neighborhood as a potential historic district because this large area was outside of the project site boundaries, and the proposed project would not have a significant effect on potential historic resources in this area. This report did identify the Marina neighborhood's earlier connection to the Panama-Pacific International Exhibition (PPIE), stating that the neighborhood was developed primarily in the 1920s – 1940s on the land created for the 1915 Exposition. Although portions of the West Harbor and the Marina Green in the project area were developed for the 1915 PPIE, the project would not affect the relationship of the West Harbor or any other portions of the marina to the surrounding residential area, and would have no effect on any future residential historic district. As there would be no change or expansion in location or use of the marina, no significant visual effect to the residential area would occur.

Additionally, the DEIR did not identify any significant indirect impacts to other off-site yet nearby historic resources, such as the Palace of Fine Arts, the Marina Green, Fort Mason, or the San Francisco Maritime National Historic Park. While the marina neighborhood may be a potential historic district for its architectural and historical significance, due to the separation (between 200 to 400 feet) this neighborhood has from the proposed landside and waterside changes at the marina, including intervening features such as the Marina Green and/or Marina Boulevard, no significant impacts to the marina neighborhood are anticipated as a result of the project.

6. SOILS, GEOLOGY, AND SEISMICITY

COMMENT 6.1

The EIR indicates that the project is located in an area that would be subject to strong ground shaking and potential liquefaction which we've already heard. However, two investigations could only conclude that while this would occur, it would not be economically feasible to construct ground improvements to reduce liquefaction. Well, that in itself is a reason to me for us not to approve it. You're telling us that it is dangerous, but it costs too much money not to be dangerous, so approve it anyway. I, in good conscience, couldn't do that. Clearly, the Fair's seawall and the Marina Green issues would be a problem. In the EIR it addresses these issues independently but it doesn't look at a cumulative impact of ground shaking on the area were they all to happen at one time. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

So we know the soils are unstable there so it's going to have an environmental impact and there is a good - 60% chance we'll have a major earthquake here in the next 30 years. (*Commissioner Bill Lee, Public Hearing Transcript, October 6, 2005*)

We have a known and defective public health and safety issue here. (*Joan Girardot, Public Hearing Transcript, October 6, 2005*)

The scope of the project is seriously flawed and you've heard it from a number of people already. It does not include the seismic retrograde for the seawalls, the Marina seawall and the Fair's seawall. Both of those seawalls are identified as potentially significant historic elements and yet, the study does not find any significant, potentially significant environmental impacts. Even though the study also says that these seawalls, if they are not protected and they do collapse, they will create liquefaction problems and vibration problems that will collapse the entire seawall, the Marina and piers. The scope of development is still incomplete as well, because it doesn't even study how they're going to attach the breakwater, nor does it say where they're going to attach it. (*David Cincotta, Public Hearing Transcript, October 6, 2005*)

Just very quickly, the environmental impact report will, whether or not seawalls remain as is, or whether or not they are replaced or rebuilt, the environmental impact report is going to have to speak to the potential environmental impact if we have a finding that in order for the EIR to be adequate and accurate as it relates to potential environmental impacts, it has to address those seawalls as they relate to that potential for environmental impact. (*Commissioner Hughes, Public Hearing Transcript, January 12, 2006*)

These Seawalls have been found by the City itself to be seismically defective. Since the Project does not include their seismic retrofitting, the failure of either of these Seawalls during an earthquake will destroy the Harbor. *(Ronald J. Mulcare and Edward J. Barrett, September 27, 2005)*

Since these structurally inadequate Seawalls are an integral part of the West Harbor, their upgrade should be part of any multimillion dollar Harbor improvement Project. No commercial lender would finance Harbor improvement if the Seawalls were not retrofitted, Cal. Har. & Nav. C., Sec.71.4(b). *(Ronald J. Mulcare and Edward J. Barrett, September 27, 2005)*

This effort produced the Marina District Liquefaction Report in July 1991 recommending certain earthquake safety measures be implemented. The measures were assigned priorities. The number one priority in the Report is the retrofitting of the Marina Seawall and the number three priority is the Fair's Seawall to bring both into conformity with current seismic safety standards. *(Ronald J. Mulcare and Edward J. Barrett, September 27, 2005)*

As to the Seawalls-the DEIR acknowledges there are at least two environmental impacts. They are to Historical Resources and Soils, Geology and Seismicity. See DEIR pp. S-8 and 11. *(Ronald J. Mulcare and Edward J. Barrett, September 27, 2005)*

As to seismicity the DEIR admits, as it must, "The project site is located in an area that would be subject to strong ground shaking and potential liquefaction" in the event of an earthquake of the Loma Prieta Quake's intensity and that "During future earthquakes, liquefaction could damage one or both of the marina seawalls." DEIR p. S-11. What does the DEIR recommend to mitigate this damage to the Seawalls that are an integral part of the West Harbor? Nothing, with the exception that at the site of removal of the mole at the foot of Scott Street a toe may be constructed for a small portion of the Fair's Seawall. DEIR p. IV-3-4. Nothing is to done to upgrade or retrofit the Marina Seawall ("do nothing" and "repair...after an earthquake." DEIR p. III.D-9) or most of the Fair's Seawall, including that part of it where the Breakwater is to tie into the Fair's Seawall. *(Ronald J. Mulcare and Edward J. Barrett, September 27, 2005)*

The point is does it protect the seismic retrofitting project, the 40 million dollars that you're putting into this project when the seawall and the spit are the northern and southern boundaries of the project. So I would suggest to you that, forget about as much as I sympathize with Mr. Mulcare's house, forget about his house. You're talking about spending 40 million dollars of the city's money and the collateral for the loan, if you read the department of boating and waterways, the collateral for the loan is the harbor itself. So the collateral is going to disappear into the bay along with the seawalls. *(Alan Silverman, Public Hearing Transcript, January 12, 2006)*

Response 6.1

As described on pages III.D-8 to III.D-11 of the DEIR, previous investigations have indicated that the seawalls and St. Francis Spit are susceptible to damage, including lateral displacement in the event of a major earthquake. However, the proposed project would neither affect the ability of the seawalls to withstand a major earthquake nor alter the St. Francis Spit, so there would be no change

in seismic risk due to the proposed project. The construction of the proposed breakwater along part of Fair's Seawall within the West Harbor could potentially reduce displacement of the seawall at this location during a major earthquake.

The project has the potential to affect the seawalls only in two minor respects. A small portion of the Fair's Seawall may be affected by removal of the mole at Scott Street; mitigation is required to assure that any increased wave action at this location does not affect the seawall. Also, a new breakwater and ADA-compliant ramp would abut the Fair's Seawall, and mitigation is required to assure that the final design of these structures does not damage or alter the historically significant features of the seawall.

CEQA requires an evaluation of potential change to the existing environment or setting resulting from the proposed project. The proposed project would result in no significant adverse changes to the existing condition of the marina's seawalls in terms of their seismic stability. Other policy concerns may be implicated by the existing conditions of the seawalls, but the seismic risk associated with the seawalls is not a change caused by the proposed project and remedying this existing seismic risk is not required by CEQA.

Many comments about the seismic safety of the Marina Boulevard and Fair's Seawalls suggested that a seismic retrofit of these seawalls should be included as part of the project to protect the marina facilities and to reduce the potential effects of liquefaction in the greater Marina District. Potential effects related to potential damage to the seawalls in the event of a major earthquake are addressed in Section III.D, Geology and Soils.

With regard to the Marina Boulevard Seawall, reports conducted in 1991 and 1997 as part of a City study on liquefaction potential in the Marina District (Harding Lawson Associates, et al., 1991; Treadwell and Rollo, 1997) concluded that in the event of a major earthquake, the Marina Boulevard Seawall could move to the north, and the area behind the seawall could experience vertical settlement, as described on page III.D-9 of the DEIR. However, the major concerns related to this movement were settlement to the north of the box sewer which runs beneath Marina Boulevard, and damage to the box sewer, which would act as a retaining wall for soil south of Marina Boulevard during a seismic event. The 1997 report recommended improvements to the seawall to reduce potential damage to the box sewer, but the report stated that improvements would not be expected to reduce liquefaction potential in the greater Marina District. Furthermore, as stated on Page III.D-9 of the DEIR, even if the improvements were implemented, the Marina Boulevard Seawall could still be damaged by areawide spreading during a major earthquake.

Regarding Fair's Seawall, as stated on page III.D-8, the 1991 report concluded that the Marina Green would settle an average of up to one foot if the seawall failed and that failure of the wall would not cause substantial ground movements in the greater Marina District to the south of the Marina Boulevard box sewer. The 1991 study also determined that improvements to the seawall would not be feasible to reduce liquefaction in large areas such as the Marina Green, and concluded that ground improvements would be necessary if movement of the seawall and settlement in the Marina Green were to be reduced.

The City and project sponsors understand the source of the public concern about seismic risk and liquefaction in the Marina District, especially after the damage which occurred in this neighborhood during the 1989 Loma Prieta Earthquake. However, the project will not change the seismic risks in the Marina District. Further, seismic improvements to the seawalls would not avoid or reduce the areawide liquefaction/lateral spreading risks associated with the Marina District, as the seawalls do not provide lateral stability for the entire area and would not do so with seismic upgrades. As provided in the testimony at the DEIR public hearing on January 12, 2006, by a geotechnical expert, Frank Rollo, the marina box sewer running beneath Marina Boulevard provides the Marina District with some amount of protection from liquefaction in the event of a major earthquake. Considering the large mass of unconsolidated fill behind and to the south of the seawalls that would continue to spread laterally in the event of a major earthquake, even seawalls that were seismically strengthened could be damaged in an earthquake unless most of the fill behind the seawalls was replaced and recompacted. Strengthening the seawalls and the soil immediately south of them would not address the existing risk of liquefaction to which a large part of the developed residential area of the Marina District is susceptible. The existing seismic risks and steps to reduce the risk of earthquake-induced liquefaction/lateral spreading in the neighborhood are outside the scope of the proposed project.

As described on page III.D-11 of the DEIR, the proposed project would not affect the structural integrity of either seawall. While previous studies have indicated the potential for the seawalls to move and settle in the event of a major earthquake on the San Andreas or Hayward faults, this existing areawide risk would not be affected or worsened by the proposed project. Furthermore, the box sewer and Marina Green are not part of the proposed project. Since neither the box sewer nor Marina Green are part of the proposed project, it is outside the scope of the proposed project to incorporate the recommended improvements to the seawalls into the project components. The proposed project would also not preclude such improvements from occurring in the future.

The DEIR describes the seismic impacts which could result from the proposed project due to the relocation of the Harbor Office to the Degaussing Station site. This building is located adjacent to and partially on top of the Fair's Seawall, which studies have shown could move and settle in the event of a major earthquake. Reoccupancy of this vacant building associated with implementation of the proposed project could expose people who would not otherwise utilize this building to a seismic hazard. As stated on page III.D-10 of the DEIR, the Seismic Hazard Mapping Act requires a geotechnical investigation for the renovation. To address this requirement, the DEIR specifies implementation of Mitigation Measure GEO-1. This measure requires that a geotechnical investigation and geotechnical report would be prepared to identify measures to reduce seismic hazards to the building and its occupants (including the effects of liquefaction and vibrations produced from liquefaction) to an acceptable level; the recommendations of the report would be incorporated into the final design of the project. Furthermore, the project sponsor would obtain review of the plans by the San Francisco Department of Building and Inspection as a condition of project approval. With implementation of the geotechnical investigation and report, incorporation of the geotechnical recommendations, and review by Department of Building and Inspection,

impacts related to the seismic safety of the proposed Harbor Office would be less than significant, as concluded in the DEIR.

The proposed berths and marina facilities along the seawalls and St. Francis Spit, like the entire Marina District, would be susceptible to damage in the event of a major earthquake, because the entire area is underlain by liquefiable soils. The proposed project components, however, would be constructed to newer seismic standards and would be less susceptible to damage than existing facilities. Project design characteristics incorporating up-to-date seismic standards together with Mitigation Measures GEO-1 to GEO-2 would provide a high level protection against seismic hazards for all project components.

COMMENT 6.2

The seismic retrofitting of the seawall is required is known. Dredging without retrofit will further destabilize the seawall. I support the request that the project scope include evaluation of seismic retrofit of the seawall to render the EIR adequate and accurate. (*Marilyn Amini, Public Hearing Transcript, October 6, 2005*)

What's to say Marina Boulevard is not put in further danger by dredging harbor deeper and removal of East West mole removed to accommodate the deeper drafted super yachts? (*Will LeRoy, undated*)

Response 6.2

Please see Response #6.1. Dredging in the West Harbor and near the seawalls and the moles would be conducted under the maintenance dredging permit as discussed on page 53 of the Initial Study and would continue, regardless of the project, to offset the normal accumulation of sediments in the harbor. The amount of dredging as proposed in the project description would not increase the risk of damage to the seawalls in a seismic event. The permit allows dredging to a depth of -12 feet mean low or lower water (MLLW) in the berths, -14 feet MLLW in the fairways and turning basin, and -25 feet MLLW plus a two-foot overdredge in the entrance channel. This ongoing maintenance dredging has not compromised the seawalls or Marina Boulevard in the past, and would not be expected to do so in the future.

COMMENT 6.3

The seismic condition of sea walls and St. Francis Spit was not taken into account. The sea walls form the southern boundary of the west harbor, and the St. Francis Spit forms the northern boundary. The proposed new breakwaters would attach to them, but the project has ignored the need to renovate the sea walls and the spit. No commercial lender would finance the subject project without requiring the sea walls and the St. Francis Spit to be retrofitted (see California Harbor & Navigation Code Section 71.4 (b)). As stated in the DEIR (see page S-12), the California Seismic Hazards Mapping Act (Public Resources Code Section 2690 et seq.) and the San Francisco Building Code (Section 1804.5) require a geotechnical investigation and report to be prepared for new or renovated buildings in liquefaction zones. No such report has been prepared. (*Alan Silverman, Marina Community Association, January 18, 2006*)

The State of California through its Department of Conservation, Division of Mines & Geology, has determined both the Marina Seawall and the Fair's Seawall are located in area subject to liquefaction. In its Official Map of Seismic Hazard Zones for the City and County of San Francisco released November 17, 2000 the State mandates that since the Seawalls are in areas "where historic occurrences of liquefaction" have taken place, "mitigation" measures "consistent with established practices and that will reduce seismic risk" are "required". See Seismic Hazards Map and Pub. Res. C. Sec.2693(c). "Cities and counties shall require, prior to approval of a project located in a seismic hazards zone, a geotechnical report". Sec.2697(a). This is specifically required of the City and County of San Francisco, Section 2693(a). San Francisco Building Code Section 1804.5 similarly requires a seismic report before a project can proceed. The DEIR admits that no such report has been prepared to date for this Project. See DEIR, pp. S-12 and III.D-8-10. (*Ronald J. Mulcare and Edward J. Barrett, September 27, 2005*)

Response 6.3

See Response #6.1. Mitigation Measure GEO-1, page IV-3 of the DEIR, requires the project sponsor to prepare a geotechnical investigation and report for the reoccupancy of the Degaussing Station, and to implement the physical improvement recommendations in the report.

COMMENT 6.4

Additionally, the EIR indicates the potential impact to the Fair's seawall could be damaged from exposure to wave action due to removal of the north/south mole at the foot of Scott Street. Under these circumstance, I believe that the need for the seismic upgrade is even more important. A review of potential harm to the seawalls from seismic activity should be more thoroughly addressed and a design should be part of the EIR for the Commission's review of this EIR. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

Response 6.4

As summarized on Page III.D-13 of the DEIR, the exposure to wave action where the mole at the foot of Scott Street would be removed would not likely be sufficient to make the seawall more susceptible to seismic damage. Regardless, the DEIR includes Mitigation Measure GEO-2 requiring inspection of the newly exposed portion of the seawall, construction of toe protection along the newly exposed portion, periodic inspection of this segment of the seawall, and immediate repair of any defects noted. Implementation of this measure further assures that the seawall would not be more susceptible to seismic damage due to increased wave action at this location. Therefore, removal of the mole would not necessitate seismic strengthening of the seawalls. See also Response #6.1.

COMMENT 6.5

It's the seawall and you have a lot of pedestrians that spend a lot of time right along those pathways and you're putting their lives at risk if you don't do everything that you can to seismically upgrade the seawalls. (*Sue Chang, Public Hearing Transcript, January 12, 2006*)

Response 6.5

As stated on page III.D-10 of the DEIR, public exposure to seismic risks would not change substantially from those present under current conditions because the project would not substantially change the number of visitors to the marina. Risk to pedestrians on the seawall pathway would not increase as a result of the proposed project compared to current conditions. While seismic risks to all users of the area are an issue for consideration, CEQA does not require that conditions which do not result from the proposed project be considered a significant impact to be addressed through mitigation.

COMMENT 6.6

After the Loma Prieta earthquake in 1989 the City Fire Department installed drafting fire hydrants along the waterfront. These are physically attached to the sea walls, and Appendix C to these comments shows hydrants attached to the Marina Boulevard Sea Wall. Others attach to the Fair Sea Wall. If the sea walls were to collapse in a future major earthquake, as Mr. Rollo testified, these hydrants may be rendered useless. That may result in more fires and loss of life. At that point Mr. Rollo's suggestion of just rebuilding them after they fall down may not seem like such a good idea. (*Alan Silverman, Marina Community Association, January 18, 2006*)

There was no evaluation of the drafting hydrants that were installed along the seawalls following the Loma Prieta earthquake. How will this project impact the drafting hydrants and their [sic] ability to pull water from the bay in the event of a large fire in the Marina District? Would seismic upgrade to the Marina and Fairs seawalls improve the likelihood that the drafting hydrants would remain in operable condition following a large earthquake? Would the DEIR's conclusion "to repair the seawall and the sidewalk after an earthquake" affect the ability of SFFD to access the drafting hydrants in the event of a large fire in the Marina District? (*Sue Chang, January 19, 2006*)

Response 6.6

Because the project would not weaken the structural integrity of the seawalls or damage them in any way beyond that addressed by Mitigation Measure GEO-2, the proposed project would not contribute to the potential for the seawalls to fail in a seismic event. Therefore, the proposed project would also not contribute to potential damage to the hydrants along the seawall.

COMMENT 6.7

The Degaussing Station sits on top of the Fair's sea wall. On page III.D-10 the DEIR states:

"...reoccupancy of this building under the proposed project could expose people who would otherwise not utilize this building to a seismic hazard. Without mitigation, this impact would be potentially significant."

On the same page it is suggested that there should be a report prepared that:

"... would identify measures to reduce seismic hazards to an acceptable level."

The promoters of this project apparently believe it is appropriate to spend money to protect the Harbor Master, but not the public who may be walking on the same wall or the boat owners on whom the wall may collapse. (*Alan Silverman, Marina Community Association, January 18, 2006*)

Response 6.7

The project as proposed would increase seismic risks to users of the Harbor Office as a result of its new location. It would not increase seismic risks to users of the marina or other visitors to the area beyond the existing conditions.

See Response #6.1 regarding the potential for damage to marina facilities during a major earthquake. As stated on page III.D-10 of the DEIR aside from the Harbor Office relocation, public exposure to seismic risks would not change from those present under current conditions because the project would not substantially change the number of visitors, therefore this existing seismic risk exposure is not an impact associated with implementation of the proposed project.

COMMENT 6.8

Mr. Rollo testified that seismic upgrade to the seawalls might not provide enough protection to help the homes closest to the Marina in the event of a large earthquake. Seismic upgrade to the seawalls would increase the walls' ability to withstand an earthquake. It would protect anyone who might be along the seawall or pedestrian promenade at the time of an earthquake. It would protect the drafting hydrants, which could not only provide crucial fire protection for private property, but also the Claire Lilienthal Elementary School, located 2 blocks from the project site. It could help prevent injury to the hundreds of people who sit along the seawall during the Fleet Week festivities. To ignore this known risk is unforgivable. (*Sue Chang, January 19, 2006*)

Response 6.8

As summarized in Response #6.1, the 1991 report concluded major ground movements in the vicinity of both seawalls would be restricted to the area to the north of the Marina Boulevard box sewer (pages III.D-8 and III.D-9). The 1991 report does not address improvements to reduce liquefaction hazards in the greater Marina District to the south of Marina Boulevard, and this area is outside the scope of the proposed project. See also Response #6.6 about potential damage to the fire hydrants.

Seismic upgrades to the seawalls are not included in the project analyzed in this EIR and could not be required as mitigation for the proposed project.

COMMENT 6.9

...this project should be revisited is because we need to have a full scale engineering model done on that area that addresses liquefaction. This is very important. (*Francisco DeCosta, Public Hearing Transcript, October 6, 2005*)

Response 6.9

See Response #6.1. The commenter's opinion about possible areawide liquefaction hazards is noted. Discussion of liquefaction hazards associated with seismic activity is provided in DEIR Section III.D, Soils, Geology, and Seismicity. As noted in this section, the existing liquefaction hazard present in the Marina District, which includes the project site, has been evaluated in three separate engineering studies since the 1989 Loma Prieta Earthquake.

COMMENT 6.10

...the work already under way on Pier One that the National Park Service and the Fort Mason Foundation have some near-future plans for; seismic retrofitting... (*Suzanne Lifson, Public Hearing Transcript, October 6, 2005*)

I will mention that the Park Service said that in their opinion the report has not documented through any studies or engineering analysis that the project will not have negative impacts to the Marina side caissons of structure Pier One. (*Suzanne Lifson, Public Hearing Transcript, October 6, 2005*)

...but I would like to state that the Moffatt and Nichol study is severely flawed and it was simply a computer model, and is not significant to solve and to do any planning with. (*Nathaniel Berkowitz, Public Hearing Transcript, October 6, 2005*)

The studies by Moffatt & Nichol were models and require verification. (*Nathaniel Berkowitz, October 18, 2005*)

The need for test pile program is mentioned in the EIR because of the specific vibrations related impacts to Pier One that cannot be quantified until a further design detail is provided, which is not in this EIR. So I believe the design and analysis should be part of the EIR because the EIR states a geo-technical investigation would determine if an alternative pile type or installation method would minimize vibration and/or liquefaction hazards. So the design and the test pile program analysis I believe should be a part of the EIR.

I find it extremely contradictory, and I would like to see it addressed, why the determination by Moffatt and Nichol engineers that the increase in extenuated wave load would be well within the structural capacity of Pier One when it is stated in the EIR that is an unknown factor, considering we have no design. So I find that it causes me to question the engineering study that has been provided, because it is contradictory to what they say can happen. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

Impacts to Pier 1 and Breakwater Improvements Study. The Breakwater Improvement Study completed by Moffatt and Nichol Engineering is a feasibility level of analysis. It states "numerical modeling analyses were conducted based on standard assumptions, familiarity with site specific issues, and professional judgment. Specifically, field data related to waves, currents, and bottom bathymetry were not collected for performing calibration of the numerical models." The modeling predicted changes in wave, current and sedimentation patterns inside the West and East Harbors, not under Pier 1. As such, the

study was not able to adequately predict changes under Pier 1. Without a more detailed level of analysis that uses site specific data, the study fails in its intent to accurately address impacts of the breakwaters on Pier 1. As a result, the EIR fails to disclose the extent of possible significant effects of the proposed project. It is our opinion that the feasibility study used incorrect assumptions and therefore its conclusions do not accurately reflect a site specific impact assessment. (*Brian O’Neill, U.S. Department of the Interior, January 19, 2006*)

We do not feel that the proposed mitigations reduce impacts to Pier 1 to an acceptable level. Mitigation GEO-3. This mitigation postpones identifying and assessing impacts of the breakwater on Pier 1 until a later design stage. An undefined inspection program to determine if the breakwater is causing damage is not adequate mitigation especially since Pier 1 is not identified as being included in the inspection program. This mitigation does not identify what are the options available to the park if we feel that the impacts of the floating breakwater as designed are negatively impacting the resource or what role the NPS would take in the monitoring. Any monitoring program to assess impacts to Pier 1 would need to be closely coordinated with the NPS to ensure agreement on data, methods, and results.

This mitigation requires periodic visual inspections for evidence of cracks, scour, or other forms of damage, and that identified defects shall be repaired promptly. It is unclear as to whether the inspections are required to be performed at Pier 1, if inspections and repairs are required to be made for the listed damages at Pier 1 at the expense of the East Harbor operations, or the duration in which such inspections and repair are to be performed. (*Brian O’Neill, U.S. Department of the Interior, January 19, 2006*)

Mitigation – GEO 4. This mitigation leaves the definition of an “acceptable structural threshold” open to interpretation. Because Pier 1 is a historic structure, we believe that no damage, structural or otherwise, is acceptable. We know that Pier 1 in its existing condition will suffer damage from adjacent pile driving: loose concrete will fall into the bay, cracks will enlarge and deterioration will accelerate. We need additional information on the test pile program and the NPS coordination that would occur to determine “acceptable threshold levels” and “alternative pile type or installation methods.” This mitigation also does not address the level of repair that will be performed by the project sponsor if any of the pile driving methods damage Pier 1. (*Brian O’Neill, U.S. Department of the Interior, January 19, 2006*)

Response 6.10

Breakwater Improvement Study

As summarized on page III.D-11 of the DEIR, the Breakwater Improvement Study by Moffatt & Nichol Engineers applied feasibility-level modeling based on standard assumptions, familiarity with site-specific issues, and professional judgment to provide an estimate of the maximum potential effects of the project, not only on Pier 1, but throughout the project area. The assumptions and conclusions of the study were peer reviewed for accuracy by an independent engineering firm, Coast and Harbor Engineering, who found the study’s conclusions about the project’s effects on hydrodynamics and circulation, wave protection, and sedimentation to be correct in terms of its assumptions, approach, and data used in the analysis. The study is provided in Appendix C of the DEIR. Conducting this study at this time in the planning process allows identification and

evaluation of potential project impacts and inclusion of appropriate mitigation measures to avoid potentially significant impacts.

CEQA Guidelines state that an EIR “should be prepared as early as feasible in the planning process to enable environmental considerations to influence the project program and design and yet late enough to provide meaningful information for the environmental assessment” (Sec. 15004(b)). As such, the Breakwater Improvement Study included in the DEIR was prepared early enough in the planning process to influence the project’s design, yet late enough to provide meaningful information about the project’s potential effects.

Page III.D-11 of the DEIR acknowledges that that the final designs of the breakwaters have not been completed and that the breakwaters may not perform as intended without further analysis. To mitigate this potential effect, Mitigation Measure GEO-3 requires preconstruction quantitative modeling of the final breakwater designs and monitoring after construction to ensure that they would perform as intended (see DEIR page IV-4). One issue in this analysis, and a consideration in selecting the final design for the breakwaters, will be the effects of the changes in water conditions on the Fort Mason structures. This mitigation measure has been further revised to specify greater coordination between the project sponsor and National Park Service during design, construction, and monitoring of the proposed East Harbor breakwater. Please see Section D. Staff-Initiated Text Changes.

Wave Action Effects of the proposed project on Pier 1 at Fort Mason

The feasibility-level modeling conducted for the Breakwater Improvement Study evaluated the effects of changes in wave action due to the East Harbor breakwater on the Pier 1 structures. The computer model included the area under Pier 1 and predicted the maximum expected change in wave height at the Pier 1 piles resulting from reflected waves off the proposed floating breakwater. The analysis showed that, for existing conditions, the wave-induced bending moment (i.e., force) for the Pier 1 piles in the vicinity of the harbor is about 45 kip-feet, whereas the allowable bending moment is 230 kip-feet. Using the minimum breakwater design criteria specified on page III.D-14 of the DEIR (50 percent reduction in northeast wave heights within the East Harbor and no more than 20 percent increase in northeast wave height reflected off of the East Harbor breakwater), the analysis predicted that with the proposed East Harbor breakwater, the maximum wave induced bending moment would be about 50 kip-feet (a possible increase of 5 kip-feet). Even if the remaining capacity of the existing piles were reduced by 50% of the estimated 230 kip-feet due to deterioration, the wave-induced bending moment would still be less than half of the structural capacity of the Pier 1 piles. Therefore, construction of the floating breakwater would not be expected to cause structural damage to Pier 1, even in its deteriorated condition.

With final design of the East Harbor breakwater in accordance with the specified design criteria and confirmation of potential effects with quantitative modeling and monitoring, as specified in Mitigation Measure GEO-3, the study accurately concluded that the proposed East Harbor breakwater would not have adverse structural effects on Pier 1. This mitigation measure has been further revised to specify close coordination between the project sponsor and the National Park

Service to ensure agreement on data, methods, project design, and corrective actions to be taken in the event that defects to Pier 1 are noted during monitoring. Please see Section D. Staff-Initiated Text Changes.

Pile-Driving-Induced Vibration and Liquefaction

As stated on page III.D-15 of the DEIR, based on the conclusions of the Breakwater Improvement Study, vibrations resulting from pile installation are not expected to damage the Fort Mason structures or cause liquefaction of the surrounding soils because the piles for the proposed floating breakwater would rest on dense silty sand and old Bay Mud. Repairs to Piers 1 and 2 at Fort Mason have included pile driving through the deck of the piers, very close to existing structures, without any effects on these structures. The DEIR acknowledges that the existing structural condition of Pier 1 makes it susceptible to damage. As such, the DEIR includes Mitigation Measure GEO-4 which requires a geotechnical investigation and a pile design analysis to determine the most appropriate pile design to minimize vibration and liquefaction hazards. This mitigation measure further provides for a test pile program to measure underwater vibrations as well as piling deflections, vibration monitoring of Pier 1 and associated structures, and cessation of pile driving if construction vibration exceeds an acceptable structural threshold.

Mitigation Measure GEO-4 has been revised to also specify close coordination between the project sponsor and National Park Service during the pile design analysis and test pile program to ensure agreement on acceptable vibration thresholds on Pier 1, as well as the alternative pile type or installation methods selected on the basis of these analyses. Please see Section D of this document, Staff-Initiated Text Changes.

COMMENT 6.11

Mitigation – GEO 5. This mitigation does not identify the party responsible for the costs of disassembling and reassembling the breakwater. There is also the possibility that construction of the breakwater as described can have a cost impact on the NPS project for seismic rehabilitation of Pier 1. While this approach does minimize impacts during NPS construction, the piles for the breakwater will impact overall water access to Pier 1. This mitigation also does not discuss increased wave action in the basin, due to removing the breakwater during Pier 1 construction. Since the intent of the breakwater is to reduce wave action in the basin, it appears that temporary removal of the breakwater would increase wave action and potentially cause unintended consequences damage to boats/tenants. The NPS would expect the City to accept all liability for such damage if it occurs. If this removal would not increase wave action, it could then be concluded that the floating breakwater may not be a necessary part of this project. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 6.11

As noted on page III.D-16 of the DEIR, the proposed project could result in cumulative impacts if construction of the proposed breakwater in the East Harbor would restrict or impede access required to make planned seismic repairs to Pier 1 at Fort Mason. Because this is a potentially significant

impact, the DEIR includes Mitigation Measure GEO-5 specifying design of the East Harbor breakwater such that it can easily be disconnected from the guide piles, spacing of the guide piles to allow access to Pier 1, and coordination with the National Park Service. Disconnection of the floating breakwater would not likely cause damage to Pier 1, because there would be sufficient room in the East Harbor to maneuver the breakwater sections away from (to the west of) Pier 1, avoiding this structure entirely. This measure is intended to be a temporary one, and permanent elimination of the breakwater as suggested would not meet the project sponsor's objectives. This measure has been revised to clarify project sponsor responsibilities and coordination with the National Park Service regarding the East Harbor breakwater and repairs to Pier 1. Please see Section D of this document, Staff-Initiated Text Changes.

COMMENT 6.12

Given the incomplete nature of the study, especially in regards to assessment of potential impacts to Pier 1, Fort Mason Foundation requests that the Planning Commission not certify the DEIR as presented, and that the East breakwater be designed and constructed simultaneously with structural improvements of Pier 1. (*Alexander Zwissler, Fort Mason Center, January 17, 2006*)

Response 6.12

Please see Section D of this document, Staff Initiated Text Changes, specifically Mitigation Measure GEO-5 about coordination between the National Park Service and the City with regard to project construction schedules in the East Harbor. The breakwater improvement study is adequate for CEQA review purposes.

COMMENT 6.13

Increasing any wave action could accelerate the necking of the pier caisson increasing the risk of structural failure, resulting in significant adverse impacts to this historic landmark. We do not support any action that would increase wave action on the caissons until we are able to raise funding to implement a planned retrofit program to strengthen and repair the caissons. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 6.13

The necking of concrete caissons (piles) in the inter-tidal zone occurs over many years of exposure. If the Pier 1 piles are not retrofitted, additional necking would occur with or without the proposed breakwater, as has been occurring incrementally over time under current conditions. Although the additional wave exposure attributable to the breakwater would not likely be a significant factor in the rate at which necking takes place, potential improvements (such as wrapping the inter-tidal zone of the piles with appropriate plastic sheeting until the retrofit is completed) could be made to the Pier 1 piles through coordination with the project sponsor and the National Park Service, specified in Mitigation Measure GEO-1. See also Section D of this document, Staff-Initiated Text Changes.

COMMENT 6.14

The study also does not adequately address the issue of sediment scouring and deposition and we continue to believe there could be additional scour at the outer end of the floating breakwater. The two dimensional model used (Mike 21) does not adequately deal with horizontal floating obstructions such as a floating breakwater and there is no means to appropriately represent the vertical flows that would result from the presence of this structure. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Directing additional wave energy under Pier 1 could worsen this situation. It is not acceptable for any scouring, and subsequent damage, to occur as a result of installation of the new breakwater. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 6.14

The maximum increase in wave height in the vicinity of the floating breakwater was estimated to be about 7 inches (see page 13 of Moffatt & Nichol study, Appendix C of the DEIR), which could occur in a 25-year storm event. The floating breakwater would be in over 18 feet of water (at low tide) near the outer end. A calculation of the maximum tidal currents entering and leaving the harbor flowing under the breakwater was estimated to be about 0.06 ft/second for a 6 ft semi-diurnal tide, well below the threshold velocity required to initiate scour in the bay mud bottom in the area. As a result, the proposed floating breakwater would not be expected to increase sediment scour or deposition beyond the immediate area. With regard to the maximum velocities produced by waves, calculations indicate that bed shear values (i.e., scour potential) would be the same whether the floating breakwater was present or not, and any increase in scour associated with the predicted increase in wave height during infrequent storms would be mitigated by the depositional environment (back filling) that occurs during the long intervals between storms.

Localized scour at the base of the breakwater guide piles may occur, but this would be limited to within 3 to 5 feet of the guide piles, and would be a function of the piles themselves rather than the floating structure. This scour therefore would not affect Pier 1. As such, the proposed East Harbor breakwater would not have a substantial effect on scouring.

COMMENT 6.15

Given this flexibility and because of the disagreement about and uncertainty of impacts, we request that the breakwater be designed and constructed concurrently with NPS's Pier 1 seismic upgrade project. This would ensure that both the floating breakwater and Pier 1 are compatibly designed so that no damage occurs to either structure. We believe this would also be cost effective for both parties. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 6.15

See Response #6.12 related to coordination between the City and the NPS. See also Section D of this document, Staff-Initiated Text Changes (Measure GEO-5) about possible joint design and construction of the breakwater/Pier 1 seismic upgrade program.

COMMENT 6.16

The final design they say they're going to do quantitative wave modeling and then decide where they're going to put it. What that means is that they're going to stand there and look at it and see if it is starting to give during the pile driving. Then they're going to do something. It literally says that in the mitigation measures. But mitigation measures, most of them don't mitigate anything. (*David Cincotta, Public Hearing Transcript, October 6, 2005*)

Response 6.16

The comment refers to the potential effects of both wave action and pile driving on Pier 1. See Response #6.10 regarding the scope of wave modeling and the appropriateness of conducting feasibility-level modeling for the DEIR analysis, as well as requirements for quantitative modeling of the final project design to ensure that the design would perform as intended (Mitigation Measure GEO-3). The visual inspections called for in this mitigation measure are for monitoring purposes, to allow for prompt repair of any damage in the event that any increased wave action attributable to the proposed East Harbor breakwater affects Pier 1. See also Section D of this document, Staff-Initiated Text Changes for further clarification of Mitigation Measure GEO-3.

With regard to pile driving for the East Harbor breakwater, Mitigation Measure GEO-4 requires that the project sponsor implement a number of measures to ensure that the vibration from pile driving construction of the East Harbor breakwater would not damage Pier 1. See also Section D of this document, Staff-Initiated Text Changes for further clarification of this measure.

COMMENT 6.17

Offsite Sedimentation and Erosion. There should be a commitment to following the recommendations in the Breakwater Improvements Study that include a "monitoring needs assessment" and "sediment characterization" (App. C, p. 2) to verify and ensure that impacts related to offsite sedimentation and erosion will be less than significant and no erosion or depositional updrift at Crissy inlet and East Beach would occur. The NPS requests review of these documents. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 6.17

The quantitative modeling that would be conducted for the final design of the breakwater structures in accordance with Mitigation Measure GEO-3 would address this concern by assessing the potential for off-site sedimentation and erosion to ensure that construction of the breakwaters would not contribute to these processes. Please also see Section D of this document, Staff-Initiated Text Changes, for changes to the wording of Mitigation Measure GEO-3.

COMMENT 6.18

The DEIR claims that the project will have no effect on the St. Francis Spit. Evidence shows the damage that the spit endured in the Loma Prieta earthquake has compromised the spit and that sand may be entering the inner west harbor from underneath the St. Francis Spit. This possibility has not been

addressed in this DEIR and this condition could have significant impacts on the frequency of dredging the harbor and could explain some of the damage to the existing berths. If the DEIR is incorrect in blaming the surge for the majority of the berth damage, then the effect of the sand coming underneath the St. Francis Spit could affect the efficacy of the proposed breakwaters. (*Sue Chang, January 19, 2006*)

Response 6.18

As discussed on page III.E-6 of the DEIR, the current maintenance dredging permit authorizes dredging of 175,000 cubic yards of sediment from the West Harbor and 350,000 to 600,000 cubic yards of sand material from the outer jetty area (immediately to the north of the St. Francis Spit) and entrance channel between the years 2000 and 2010. Removal of sand from the outer jetty area and entrance channel is referred to as sand mining and is conducted to reduce dredging requirements in the West Harbor (immediately to the south of St. Francis Spit). Sand mining in this area is performed by Jerico Products of Petaluma, which uses a suction dredge from a barge to remove sand from bottom of the harbor entrance. The suction boom, which acts like a large vacuum cleaner, skims the surface of the sand as the barge moves along on the surface of the water. The sand and water slurry is pumped onto the barge which releases the water back into the Bay through a series of slots on the sides of its deck. The remaining sand is then off-loaded in Petaluma where it is stockpiled for later sale.

The breakwaters are intended to reduce wave action in the harbors, not to decrease sedimentation. As discussed on page 50 of the Initial Study, construction of the new breakwaters would not have an effect on the average annual sedimentation rate in the vicinity of the harbor entrance, although they could result in a slightly decreased sedimentation rate in front of the breakwaters and a slightly increased sedimentation rate behind the breakwaters. Therefore there would be no net change in maintenance dredging requirements as a result of project implementation. However, the City would continue to conduct periodic monitoring of the outer jetty area in accordance with the maintenance dredging permit to estimate the rate of sand deposition and to identify the most effective long-term management strategy for control of sand deposition in the outer jetty area and subsequently in the West Harbor.

While there is no confirmation that sand is entering the inner West Harbor from St. Francis Spit, if such actions did occur, the project would not result in a change in this condition, nor would this condition compromise the harbor to a greater degree than under existing conditions.

COMMENT 6.19

The possibility of using a sheet pile breakwater in the East Harbor is never analyzed. The assumptions used to justify the floating breakwater are flawed given the history of floating breakwaters in the area. The Pier 39 breakwater was originally a floating design that failed and had to be replaced with a solid structure. There is mention of proposed improvements to Pier 1, but no time is specified, and the proposed East Harbor improvements are not currently planned. Would improvements to Pier 1 impact the design and schedule for the East Harbor Breakwater? The analysis also fails to deal with the impact of vessel

wakes. Both the ferry boats and ships create wakes that significantly impact the Marina. Outbound vessels have the greatest impact. (*Ralph Kanz, October 20, 2005*)

Response 6.19

As discussed on Page III.D-14 of the DEIR, the Breakwater Improvement Study considered a sheetpile breakwater at the East Harbor, but rejected this design in favor of the project's floating design because a solid structure could amplify the waves toward Pier 1 and could increase the potential for scour at the base of Pier 1's pilings.

Vessel wakes would not be any larger than the design level wave considered in the feasibility-level modeling conducted for the project. Therefore, separate consideration of vessel wakes would not be required.

See Response #6.12 regarding coordination between the City's East Harbor breakwater and the NPS's planned seismic improvements to Pier 1.

7. HYDROLOGY AND WATER QUALITY

COMMENT 7.1

And yet we do not have exact placements of these breakwaters in the outer west harbor. Now why is that particular issue important? Because there is a combined sewer outflow there. If you had the vertical breakwater to the west of the combined sewer outflow, you would have different water quality impacts than if you put it to the east. So without an exact placement in the final design or the project components, how can you not hold the city agency to the same standard that you would hold a private developer? (*Joan Girardot, Public Hearing Transcript, January 12, 2006*)

As an illustration of the problems that can arise for adequacy of environmental review when only preliminary design is required, if the exact placement of the 200 foot long breakwater perpendicular to the Fair's Seawall is not known, then the environmental review cannot determine whether the breakwater will be to the west or to the east of the existing CSO and without this knowledge, the effects of the Project on water quality cannot be evaluated. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

How will the breakwaters being placed outside the storm sewer runoff pipe affect the water quality of the inner west harbor following storm sewer overflow? (*Sue Chang, January 19, 2006*)

Response 7.1

As noted on pages 48 and 49 of the Initial Study, the Pierce Street combined sewer outfall (CSO) is located near the entrance to the West Harbor. CSO discharges occur during overflow events about three times per year on average and only after rainy events. Although the precise location of the new breakwaters has not been determined, it is clear that the southernmost of the two West Harbor breakwaters would be constructed to the east of the Pierce Street CSO, because the CSO is well to

the west of any potential location of the breakwater. The proposed project could affect the existing water quality, in terms of dilution and flushing, if the breakwaters reduced water circulation in the West Harbor. However, as described on page 49 of the Initial Study, construction of the West Harbor breakwaters would not change the existing water quality in the West Harbor because they would not substantially change existing flushing rates. Circulation modeling shows that removal of the north-south mole and shortening of the east-west mole may slightly improve flushing rates in the harbor, potentially improving water quality. As such, even with placement of the West Harbor breakwaters, discharges from the Pierce Street CSO would be flushed out of the harbor at the same rate, or potentially better, than under existing conditions. Finally, the numerical modeling used to predict the effects of the reconfigured breakwaters on flushing rates would be subject to further review by BCDC as part of the application process for a Major Permit. If BCDC found as part of its permit review that the final breakwater design had the potential to appreciably reduce flushing rates, then BCDC could require a change in breakwater design. While not anticipated, such design changes could include shortening and/or relocating the breakwaters to another part of the West Harbor. As shown in the initial modeling completed for this project, however, no changes to flushing rates are anticipated as a result of the proposed breakwaters design.

COMMENT 7.2

The EIR states that both the East and West Harbors would be dredged to accommodate the project. The East Harbor would be overdredged an additional two feet to allow for the placement of an engineered cap that would prevent the disturbance of contaminated sediments. As the marina is an area that needs to be periodically dredged, we are concerned that future dredging episodes could penetrate the cap. Please provide more information regarding the cap and the potential for disruption of the cap during future dredging activities. (*Michelle Burt Levenson, BCDC, October 20, 2005*)

Response 7.2

As summarized on pages III.E-11 and III.E-12 of the DEIR, the cap would be designed in accordance with applicable engineering criteria and subject to approval by the Regional Water Quality Control Board as specified in Mitigation Measure HYDRO-2. Specific plans for placement and design of the cap would be included in the Consolidated Dredging-Dredged Material Reuse/Disposal Application to the Dredged Material Management Office and would be formulated on the basis of sampling and analysis conducted in support of this permit, closer to the time that dredging is conducted.

Methods for preventing damage to the cap in the East Harbor during maintenance dredging, and for repairing the cap in the event that it is damaged, would be specified in the detailed monitoring plan prepared in accordance with Mitigation Measure HYDRO-3 and in the maintenance dredging permit obtained for this project, discussed on page III.E-13 of the DEIR. Mitigation Measure HYDRO-3, specifically, states that the project sponsor shall implement a monitoring program to ensure that the contaminated sediments remain in place, that the cap material is placed correctly and uses the appropriate materials, and that the cap is effective in isolating the contaminated sediments. A detailed monitoring program shall be prepared during the design phase of the project and would

require approval from the RWQCB. Available methods to ensure that the cap would not be penetrated could include use of dredging equipment specially designed to achieve precise control over depth and area of sediment removal. As such, periodic dredging is not anticipated to penetrate the cap or potentially affect water quality.

COMMENT 7.3

The NPS suggests the project proponents consider the requirement to apply for Notice of Intent on the State of California National Pollutant and Discharge Elimination System – Construction Permit. As such, the NPS would appreciate the opportunity to receive and review the Stormwater Pollution Prevention Plan and accompanying Best Management Practices that could help ameliorate impacts to NPS-managed property, assets and resources associated with the project. The NPS additionally suggest the project sponsor consider and provide a discussion on implementation of Best Management Practices (BMPs) under the City and County of San Francisco Municipal NPDES permit. Neither the discussion regarding water certification on page III.E-12 nor the discussion under Water Impacts on pages 48 and 49 in the IS adequately address these requirements. As such, these discussions do not fully support the conclusion drawn in page 51 of the IS regarding the sufficiency of discussion and mitigation measures associated with stormwater management issues. (*Brian O’Neill, U.S. Department of the Interior, January 19, 2006*)

Response 7.3

The statewide General Permit for Storm Water Discharges Associated with Construction Activity (General Construction Permit) applies to stormwater discharges to a separate storm sewer or directly to surface water. As stated on page 48 of the Initial Study, stormwater runoff from the parking area and other on-land portions of the project site currently drains to the City’s combined sewer system rather than to a separate storm sewer system or directly to the Bay. The requirements of the statewide General Construction Permit would, therefore, not apply to this project.

Rather, discharges to the combined sewer system are treated and discharged to the Bay in compliance with the City’s National Pollutant Discharge Elimination System (NPDES) permit as described on page 50 of the Initial Study. In accordance with the permit, the discharges to the Bay are in conformance with requirements of the Clean Water Act, Combined Sewer Overflow Control Policy, and the associated state requirements in the Water Quality Control Plan for the San Francisco Bay Basin.

As further clarification, construction stormwater discharges from the landside portions of the site would be subject to the requirements of Article 4.1 of the San Francisco Public Works Code, which incorporates and implements the City’s NPDES permit and the nine minimum controls described in the federal CSO Control Policy. The nine minimum controls include development and implementation of a pollution prevention program. At a minimum, the project sponsor would be required to develop and implement an erosion and sediment control plan to reduce the impact of runoff from the construction site. The erosion and sediment control plan must be reviewed and approved by the City prior to implementation, and the City conducts periodic inspections to ensure

compliance with the erosion and sediment control plan. The project sponsor would make this plan available to the NPS for review prior to construction activities.

Water pollution associated with waterside construction would be addressed in accordance with the requirements of a Section 10 permit from the United States Army Corps of Engineers (USACE) and water quality certification, or waiver, by the RWQCB. In addition to providing water quality certification for activities that would be conducted in the Bay, the water quality certification would include specific conditions requiring use of best management practices to: minimize the discharge of construction materials into the Bay; control floating debris; control discharge of displaced water produced during construction of the concrete pilings to minimize discharge of pollutants to the Bay; place fueling activities such that they would not affect water quality; and provide spill containment to control potential accidental spills and equipment to clean up potential spills during construction.

COMMENT 7.4

And again I want to speak to the fact that the water change and water quality within the [West] harbor itself is very poor and very dirty. It takes a number of days for the water to completely change. The solution to this problem is available to us and should be investigated with an outlet at the west end of the existing harbor. (*Nathaniel Berkowitz, Public Hearing Transcript, January 12, 2006*)

Response 7.4

This comment refers to the idea of connecting the West Harbor and the Crissy Field lagoon with a channel to improve water circulation and water quality in the West Harbor. While ideas about improving water quality are welcome, this recommendation is outside the scope of the proposed project.

8. HAZARDOUS MATERIALS AND WASTE

COMMENT 8.1

The draft report does not include a thorough description of the property's historical uses, without which we are unable to determine whether hazardous substances may have been released to the soil at the Site. Although the report associates the presence of polynuclear aromatic hydrocarbons (PAHs) in the sediments of the East Harbor with a manufactured gas plant that "existed southeast of the project site," no further related information is presented. We strongly recommend a historical assessment of past activities related to the gas manufacturing plant and any other past uses. Based on that information, additional sampling should be conducted to determine whether additional issues need to be addressed in the CEQA compliance document. If hazardous substances have been released to the soil at the site, this contamination will need to be addressed as part of the project.

For example, if the proposed landside improvements, including the expansion of public facilities, construction of an additional building and landscaping include the need for soil excavation and remediation, the CEQA document should include: (1) an assessment of air impacts and health impacts associated with soil excavation activities; (2) identification of applicable local standards, which may be

exceeded by the excavation activities-, including dust levels and noise; (3) transportation impacts from the removal or remedial activities; and (4) risk of upset if an accident occurs at the Site. (*Denise M. Tsuji, Department of Toxic Substances Control, October 5, 2005*)

Response 8.1

The DEIR identifies the chemical quality of the sediments in the East Harbor, regardless of the sources, and evaluates the potential environmental consequences of dredging these sediments. Potential sources of contaminants and sampling and analyses required to fully characterize the sediments would be addressed in the sampling and analysis plan prepared in support of the Consolidated Dredging-Dredged Material Reuse/Disposal Application submitted to the Dredged Material Management Office and subject to review by the involved regulatory agencies (see page III.E-12 of the DEIR). Given the limited quantity of landside soil excavation, and the requirements of Mitigation Measure 3 described on pages 60 and 61 of the Initial Study, including assessment and remediation as necessary, any disturbed soil and potential for associated dust would be controlled by the preparation of a health and safety plan that would identify methods to protect workers and the public from hazardous materials during construction. Any soil transported from the site would be subject to a variety of regulatory requirements for handling, transport and disposal. These measures are typical for construction activities at the scale of the proposed project.

COMMENT 8.2

The DEIR proposes that approximately 17,500 cubic yards of sediment in the East Harbor containing more than 5 mg/kg of polycyclic aromatic hydrocarbons (PAH) will require upland disposal after dredging. Not only is the basis for determination of the volume insufficient to reasonably estimate the scope and cost of the proposed work, but critical issues related to the safe dredging, handling, treatment, and transport of the sediments are not addressed in the DEIR. Several fundamental aspects of the proposed dredging project should be more carefully considered, including the following: The basis for the estimated volume of sediments requiring upland disposal is not sufficiently defined. (*Robert C. Doss, PG&E, October 19, 2005*)

Response 8.2

The required depth of dredging was determined by the specific needs of the project, and volumes were determined by the required area and depth of dredging. As discussed on page III.E-1 through III.E-3, and summarized on page III.F-1 of the DEIR, the sediments that would be dredged from the East Harbor have been sampled on five occasions between 1994 and 2000 to characterize the proposed dredged material for disposal purposes. These sampling activities were the basis for the estimated volume of sediments described in the DEIR. The estimated volumes are sufficient for CEQA review purposes and to identify a range of disposal options which are discussed on pages III.E-7 and III.F-4.

The project sponsor will coordinate with all appropriate agencies responsible for regulating dredging operations to ensure that they are conducted in a safe and clean manner. As stated on page III.E.12, specific plans for disposal would be included in the Consolidated Dredging-Dredged

Material Reuse/Disposal Application to the Dredged Material Management Office (DMMO), and would be determined on the basis of sampling and analysis conducted in support of this permit at the time that dredging is conducted. The permit would be subject to approval by that office. The DMMO coordinates the dredging permit review for a variety of regulatory agencies as described on pages III.E-5 and 6 of the DEIR.

COMMENT 8.3

The DEIR presents an unrealistically simplistic picture of dredging, handling, treatment, and transport necessary for the proposed action. In the event that dredging of the sediments containing greater than 5 mg/kg of PAH is performed, stringent measures will be needed to protect water quality during dredging and to ensure resuspension and dispersal of sediments does not result in recontamination of other areas of the East Harbor or San Francisco Bay. The DEIR lacks any clear articulation of plans for management of the dredged material after removal. In addition to requiring methods to protect water quality and to reduce the likelihood of recontamination, the handling, treatment and transport of the sediments will likely involve dewatering and possibly the addition of stabilizing and solidifying agents prior to transport to an approved upland disposal facility. The cost of these potentially necessary treatment steps, as well as the possible impacts on the final disposal volumes, is not addressed in the DEIR. Moreover, the DEIR does not address the possible need for treatment and disposal of contaminated water associated with dredging and treatment of the sediments. (*Robert C. Doss, PG&E, October 19, 2005*)

Response 8.3

Requirements for managing the dredged sediments, including handling, treatment, and transport necessary for the proposed action, are addressed on page III.F-6 of the DEIR. As stated on this page, the project sponsor's dredging contractor would be required to implement Mitigation Measure HAZ-1, which includes preparation of a dredged material disposal plan specifying methods for segregation of the sediments for disposal, appropriate disposal methods for the sediments, approved disposal sites, written documentation that the disposal site will accept the sediment, procedures and requirements for loading and off-loading sediments to reduce the potential for spillage, and a cleanup plan to be followed should a spill occur. The RWQCB water quality certification, waste discharge requirements, or waiver would also require the use of best management practices to minimize the discharge of construction materials during sediment loading or other on-land sediment handling activities at the marina. These measures would also be incorporated into dredged material management plan required by Mitigation Measure HAZ-1.

Although the RWQCB water quality certification for the dredging events would specify methods for ensuring the protection of water quality both within the harbor and in adjacent waters during dredging, Mitigation Measure HYDRO-1 (page IV-5) further specifies that the dredging contractor shall employ measures to control dispersion of contaminated sediments such as use of specially designed equipment and automatic monitoring of dredging operations. These measures would be subject to the approval of the Army Corps of Engineers and their implementation would reduce the potential for dredging in the East Harbor to adversely affect other areas of the East Harbor or San Francisco Bay.

The precise nature of the required dredge management measures, including cost and schedule implications, cannot be known with certainty until the dredged material disposal plan has been prepared and reviewed by applicable regulatory agencies. The cost of dredging is not an environmental topic that is required to be analyzed in the EIR for the project.

COMMENT 8.4

The DEIR does not sufficiently address the potential for air quality impact at point of dredging and at any locations where handling and treatment of the dredged sediment would be performed. Sediments containing the stated concentrations of PAH may, when dredged, handled, treated, and transported, produce airborne emissions that represent potentially harmful concentrations of chemicals. Methods for mitigation of such possible impacts should be stated and the impact on project cost and schedule should be considered. (*Robert C. Doss, PG&E, October 19, 2005*)

Response 8.4

Preparation of a health and safety plan for the dredging and rehandling of sediments is specified in Mitigation Measure HAZ-2, as described on page III.F-6 of the DEIR. The health and safety plan would include measures to protect worker and public safety during dredging operations, including compliance with any applicable air quality regulations for dust and other emissions. The cost and schedule for the dredging are not environmental topics subject to discussion under CEQA.

COMMENT 8.5

The costs associated with the proposed dredging and disposal cannot be reasonably estimated at this time, due primarily to the high degree of uncertainty surrounding the volume of sediments possibly requiring upland disposal and the measures potentially necessary for adequate environmental and human health protection. The possible changes in volume and protection requirements could dramatically increase the cost of construction and should be more carefully considered at the DEIR stage. (*Robert C. Doss, PG&E, October 19, 2005*)

Response 8.5

Pages III.E-9 through III.E-13 of the DEIR discuss environmental issues related to the dredging and disposal of the sediments which would be similar, even if the volumes of sediment requiring dredging and disposal change. The purpose of the CEQA analysis is to determine what measures are needed to reduce or avoid substantial adverse effects which could result from the proposed project. Issues related to the dredging costs of the project are not environmental topics subject to discussion under CEQA.

COMMENT 8.6

Capping of East Harbor sediment after dredging is not necessary. The DEIR proposes the dredging of sediment in the main harbor to a depth of 9 feet and in the channel to a depth of 13 feet to accommodate a one-foot cap of 'clean' sand over the remaining East Harbor sediment. The desired effective depths of the

main harbor and channel for boat use are 8 and 12 feet, respectively. As proposed, this cap, especially in the main harbor portion of the harbor, is not necessary for a variety of reasons:

- 1) The main harbor sediment is presently capped with a one foot layer of natural 'clean' sediment at the 8 to 9 foot depth. It is evident from the ADL study (Arthur D. Little, 2000) that almost all of the harbor sediment has natural silt/clay sediment with low concentrations of PAHs (<5 mg/kg total PAH) at the depth of 8 to 9 feet, the depth interval at which the proposed sand cap would be placed. Removing this additional foot and replacing with the proposed sand cap would not improve the environmental condition of the harbor. In fact there is the potential of added environmental harm in dredging deeper sediment that may be contaminated in some areas of the main harbor. Moreover, the existing natural silt/clay 'cap' would provide a better barrier to potential transport of contaminants from underlying sediment than the proposed sand cap.
- 2) Removing an additional foot of sediment, as suggested, would result in unnecessary dredging and disposal costs; there is the potential in some areas of the harbor of dredging deeper contaminated sediment that would change the quality of dredged sediment and cause higher handling and disposal costs. Also, dredging of deeper contaminated sediment, even with the usual environmental precautions instituted during dredging, will raise environmental issues concerning spreading of contaminated sediment in the bay and harbor.
- 3) The installation of a proposed sand cap will necessitate maintenance of the cap, especially at the edge of the main harbor and channel due to the steep depth change from 8 to 12 feet in the transition from harbor to channel sediment.
- 4) The main harbor and channel will need to be dredged periodically. During the dredging, the sand cap will be disturbed and parts of the cap removed because of the imprecision of dredging activities. The cap will then need to be repaired at an added expense each time dredging occurs.
- 5) Available data regarding the integrity of the natural "cap" in the main harbor indicates a stability of sediment over the years. As a result, installation of a sand cap in the harbor will introduce a potential instability and probable need for a program to monitor the environmental conditions of the harbor sediment. The elimination of the sand cap would result in a savings by eliminating an otherwise unnecessary monitoring program. (*Robert C. Doss, PG&E, October 19, 2005*)

Response 8.6

This response only addresses changes to East Harbor, as capping would only occur in this location of the marina.

The cap was included in the project description because the city's consultants have concluded that it is likely to be required; however, the final plan would be subject to review and approval by the DMMO. As summarized on page III.E-9, construction dredging in the East Harbor would be required to a depth of -7 feet MLLW in the main harbor and -11 feet MLLW in the channel to provide adequate depth for the boats utilizing the renovated harbor. An additional two feet of material would be dredged to allow placement of the cap. Specific plans for dredging and for placement and design of the cap would be included in the Consolidated Dredging-Dredged Material

Reuse/Disposal Application to the DDMO and would be formulated on the basis of sampling and analysis conducted in support of this permit, closer to the time that dredging is conducted.

The plans would take into account areas where existing sediment may provide an adequate cover for deeper contaminated sediment and where there would be slope changes because of different depths of dredging. The plans and permit would be subject to approval by that office. It should be noted that the material that the cap would be constructed of is not specified in the DEIR. The cap material would not necessarily be sand, but would be determined during design of the cap in consultation with the RWQCB.

Mitigation Measure HYDRO-3 specifies that the project sponsor implements a monitoring program(s) to ensure that contaminated sediments remain in place, that the cap material is placed correctly and uses appropriate materials, and that the cap is effective in isolating contaminated sediments. In order to take these steps, the project sponsor will work closely with all concerned agencies at the most appropriate and effective stage in the process. Implementation of this mitigation measure would be required for any area where the cap is required.

See Response #8.3 regarding spread of contaminants during dredging operations.

Methods for preventing damage to the cap in the East Harbor during maintenance dredging and for repairing the cap in the event that it is damaged would be specified in the maintenance dredging permit obtained for this project, discussed on page III.E-13 of the DEIR. Available methods could include use of dredging equipment specially designed to achieve precise control over depth and area of sediment removal.

COMMENT 8.7

Sources of PAHs in East Harbor Sediments. The DEIR states that the PAH contaminated sediments in the East Harbor “originated from a former manufactured gas plant that existed southeast of the project site. ...” In the ADL report (Arthur D. Little, 2000) and previous environmental studies of East Harbor sediment (Advanced Biological Testing, 1994, 1997, and 1998), elevated concentrations of PAHs, presumably from coal tar residues, were identified in isolated area of surface sediments and in deeper sediments of the East Harbor. In the reports, coal tar residues were the presumed or suggested source of all the PAHs in the East Harbor sediment. This is not correct. There are significant sources of PAHs that constitute a substantial contribution to PAHs in the sediments proposed to be dredged from the harbor including creosote pilings, urban runoff and marina operations.

- 1) In the 2000 ADL study, samples were collected and analyzed at one-foot intervals. The concentrations of PAHs of almost all of the sediment, down to 9 feet MLLW in the main harbor and down to 10 feet MLLW in the channel, were determined to be in the range of 3 to 10 mg/kg total PAHs, well within the range commonly found in enclosed marinas, especially those containing large numbers of creosote pilings, as is the case in the East Harbor. There are over 700 individual creosote-treated pilings in the main harbor that contribute to the PAH loading of the harbor. Creosote is a distillation product of coal tar, still being produced in coal coking operations for the steel industry. Creosote has the same types and elevated concentrations of PAHs as coal tar,

and has been found to be a major contributor to elevated PAHs in sediment at marinas and other facilities that use creosote pilings. Sediment in marinas containing creosote-treated pilings contain as much as two to ten times the total PAH concentration of sediment that is outside a marina, in range of 3 to 20 mg/kg (Crecelius et al. 1990).² [this indicator refers to a footnote in the letter] In the East Harbor, except for a few isolated locations, the PAH concentrations in the sediment proposed to be dredged is consistently in the range of PAH concentrations in sediment in marinas containing creosote pilings. In addition to PAH from creosote-treated pilings, other activities associated with the marina itself, such as operation of internal combustion (motor boat) engines can contribute to PAH contributions in sediment.

- 2) Another potential source of PAHs in East Harbor sediments is a large conduit (4 ft diameter) outfall in the southeast corner of the Harbor which drains the surface area around the East Harbor. This conduit discharges untreated storm water runoff into the harbor. Recent research (Van Metre and Mahler, 2005)³ confirms that urban storm water runoff is a significant source of PAH to sediment. Considering the myriad of potential sources of this discharge (such as roadway runoff, atmospheric deposition, residues of pavement construction and sealing, industrial/ commercial operations, and hydrocarbon spills), this conduit is a source of PAHs of presently unknown quantity that contributes to the PAH loading of the harbor (this outfall discharge would be a contributing source of PAHs to the elevated PAH concentrations evident in some locations of the channel). (*Robert C. Doss, PG&E, October 19, 2005*)

Response 8.7

Comments about potential sources of PAHs in the East Harbor sediments are noted. The DEIR discussion does not endeavor to provide a detailed analysis of potential sources of PAHs, nor would such an investigation be required as this point in the planning process. Rather, the DEIR evaluates the potential environmental consequences of dredging the East Harbor sediments based on their existing chemical quality, regardless of the source. In any case, the commenter has provided no specific information, evidence, or citation from the referenced materials showing that contamination in the East Harbor sediments is attributable to sources other than the former manufactured gas plant. Additionally, clarification is required regarding the function of the outfall in the southeast corner of the harbor. The surface area around the East Harbor drains to the City's combined sewer system. The majority of this storm water receives secondary treatment at one of the City's treatment plants along with stormwater collected from other areas of the city, and is discharged outside of the project area. The East Harbor does contain a discharge point for the City's combined sewer system, and discharge from this point only occurs in the event of heavy rains (approximately four times per year). Storm water discharged during one of these events receives treatment equivalent to primary treatment prior to discharge. There is no untreated storm water runoff into the harbor. As such, the DEIR appropriately evaluated the potential environmental effects of harbor dredging.

COMMENT 8.8

Upland landside Phase I environmental site assessment study is not necessary. It is proposed in the DEIR that a Phase I environmental site assessment study be conducted on the upland landside areas of East

Harbor. The purpose of this study is to find and delineate the extent of would-be contamination in the East Harbor from upland sources. This study is not necessary for one major reason: The sources of elevated PAHs in Harbor sediments are known. The creosote pilings, discharge from the outfall and marina operations are the major contributors of PAHs in surface harbor sediments proposed for dredging. The harbor was dredged as recently as 1989. Therefore, isolated elevated PAHs identified in the deeper portions of the harbor sediment are probable remnants of historical industrial operations that pre-date the more recent dredging. Other major contributory inputs of contaminants in sediments to be dredged from upland sources would have been identified as part of previous studies of the East Harbor (Arthur D. Little, 2000; Advanced Biological Testing, 1994, 1997, and 1998). (*Robert C. Doss, PG&E, October 19, 2005*)

Response 8.8

As discussed on page 61 of the Initial Study, and specified in Mitigation Measure 3 – Environmental Health and Safety Plan (Initial Study page 72), a Phase I Environmental Site Assessment would not be completed in order to evaluate the source of PAHs in the East Harbor sediments, rather, it would be required for the *landside* areas of the proposed project site to assess the potential to encounter hazardous materials in the soil or groundwater during construction of landside improvements (East Harbor restrooms, maintenance building, etc.). These studies are typically required for development in locations where there are potential hazards, regardless of the type or source of the hazards.

COMMENT 8.9

The leaking oil in the East Harbor is never addressed in the DEIR. Every time there are minus tides leaking oil appears in the fairway between gates 8 and 10. How will the project deal with this leaking oil container? (*Ralph Kanz, October 20, 2005*)

Response 8.9

Although oil has been observed floating on the surface water at low tide in this part of the East Harbor, the City does not have any knowledge of a submerged oil container, as referenced in the comment. If such a container were identified during construction, proper procedures to be followed for removal or abandonment of the container and for addressing potential contamination from the container would be determined in consultation with the involved regulatory agencies.

COMMENT 8.10

Although the DEIR provides Hazardous Materials/Waste mitigation measures, none of these sections provide for a description of how the mitigation measures will be designed and implemented to monitor and prevent migration of known environmental contaminants onto NPS-managed property. The NPS requests the opportunity to review plans for handling and transportation, including spill response, of hazardous materials and wastes, including dredge spoils, for those transportation routes through or adjacent to NPS-managed properties. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 8.10

Mitigation measures identified in the DEIR require preparation of a dredged material disposal plan (HAZ-1) and site health and safety plan (HAZ-2). The dredged material disposal plan would specify procedures to reduce the potential for spills and cleanup procedures to be followed in the event of a release during sediment handling. The site health and safety plan would identify procedures to be followed to minimize the potential for exposure to harmful levels of chemicals during sediment handling, including potential exposure to adjacent properties. These plans would take into account these potential effects and the City would submit them to NPS prior to construction activities for review and concurrence. Please see Section D of this document, Staff-Initiated Text Changes, to reflect these revisions.

COMMENT 8.11

The analysis for hazardous materials neglects to address some important issues. Clarification is needed to ensure that no NPS resources would be impacted. DEIR, Page S II through S-6, Project Characteristics. The DEIR suggests that a geotechnical study is warranted if the Degaussing Station renovation report plan includes ground disturbing activities. In addition, please consider that an environmental report equivalent to a Phase III Environmental Investigation be conducted to determine the severity of existing recognized environmental conditions and the probability and degree of potential impacts to neighboring properties and NPS resources. This Phase III survey is required to address environmental issues- such as lead in soil, Polychlorinated Biphenyls, and creosote that have not been fully addressed to date in either the DEIR or Initial Study (IS). Furthermore, the DEIR and IS do not provide a discussion of Pierce street outfalls and Northshore Consolidated outfalls impact on sediment and need for additional sampling to determine increased potential for this sediment area to impact GGNRA-managed waters upon dredging. (Brian O'Neill, U.S. Department of the Interior, January 19, 2006)

Response 8.11

Phase III Environmental Investigations are typically the remediation phase of a project. The need for environmental remediation cannot be assessed without first completing the Phase I and Phase II Environmental Investigations to evaluate the potential for contamination and the extent of any contamination identified. In accordance with Mitigation Measure 3 of the Initial Study (page 72), a Phase I Environmental Site Assessment would be required for the landside area of the proposed project site. A Phase II Environmental Site Assessment would be conducted, if warranted, on the basis of the Phase I Environmental Site Assessment, to assess the presence and extent of contamination. Remediation would then be conducted, as necessary, all in coordination with the regulatory agencies. The Phase II assessment and evaluation of the need for remediation would take into account the severity of identified environmental conditions and the probability of affecting neighboring properties, including NPS resources.

As summarized on page III.E-12 of the DEIR, sediment quality, regardless of the source of potential contaminants, would be addressed by pre-dredging sampling that would be conducted in accordance with the DMMO-approved sampling and analysis plan prepared for the dredging events in both the West and East Harbors. Although the RWQCB water quality certification for the

dredging events would specify methods for ensuring the protection of water quality both within the harbor and adjacent waters during dredging, Mitigation Measure HYDRO-1 (page IV-5) further specifies that the dredging contractor shall employ measures to control dispersion of contaminated sediments such as use of specially designed equipment and automatic monitoring of dredging operations. Implementation of these measures would reduce the potential for dredging in the East Harbor to adversely affect adjacent GGNRA-managed waters.

9. TRAFFIC, PARKING, AND PEDESTRIAN SAFETY

The traffic, parking, and pedestrian safety effects of the proposed project were primarily addressed in the Traffic section of the Initial Study (DEIR Appendix A, page 21 – 27). No potentially significant impacts related to transportation were identified. Additional information about transportation and parking effects of the proposed was provided in Section V, Other CEQA Topics, in the DEIR. Because traffic effects were evaluated in both the Initial Study and DEIR, the following discussion consolidates all transportation-related comments and associated responses into one subsection of this document. Please see the comments and responses listed below.

COMMENT 9.1

The area of the east harbor parking lot has long been not only a significant gap in the Bay Trail system, but also a serious safety problem. This is a very popular and heavily used section of the Bay Trail in San Francisco, however, the current configuration forces cyclists from a pleasant Class I separated pathway through Upper Fort Mason to a sudden dead-end into high-speed traffic at Laguna and Marina Blvd. Cyclists must come to a stop while traveling downhill, dismount to access the narrow sidewalk leading to the parking lot where there is no curb cut, and ride through a dangerous, un-striped parking lot before returning to a separated pathway in front of the Marina Green. As the planning department is aware, thousands of recreational cyclists, tourists, and commuters use this alignment. While the downhill grade that dead-ends into high-speed traffic at Bay and Marina may be negotiable for experienced cyclists, users of all types ride this route because of the beautiful waterfront experience that is provided. (*Maureen Gaffney, San Francisco Bay Trail, letter, October 19, 2005*)

The existing 12-foot path on the marina green in the west harbor area is insufficient for the intensity of the current use, not to mention uses going forward. Concrete curbs that separate the driving and parking area for private boat owners create a trip and crash hazard in the area. And bay trail believes that private boat owner parking and the driving lane are not the highest and best use of the waterfront in this area. And we have asked that the EIR would address the bay trail plan and policies in the Final EIR and work on some mitigation for the trail. (*Maureen Gaffney, Public Hearing Transcript, January 12, 2006*)

The DEIR is deficient and inadequate in that it doesn't identify the bay trail along or even within the project boundaries. It doesn't identify projects on the impacts of the project on the bay trail. It doesn't analyze those impacts and it doesn't identify mitigations to those impacts. Let me show you the conditions for the public on the trail. It's used by literally thousands of people. There are many conflicts already. People are forced to ride - okay. (*Michael Alexander, Public Hearing Transcript, January 12, 2006*)

The Bay Trail [Draft EIR] is deficient and inadequate in its failure to describe types of users of the Bay Trail, in particular their wide range of recreational skills, and their range of familiarity with where they are trying to go. For example, bicyclists range from professionals and amateurs with exceptional skills who have ridden for decades and who ride this route as often as daily, to tourists on rented bikes who haven't ridden since they were children and who are riding while gazing sideways at bay vistas while trying to figure out the route to the Golden Gate Bridge. (Attachment 2.) The Draft EIR fails to disclose that elements of the Project will particularly impact Bay Trail users with low skills and familiarity with the area. (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

Streets and driveways where vehicles cross the trail are similarly dangerous, due to poor placement of stop signs, inadequate warning signs and inadequate striping of crosswalks. (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

While I understand the desire for this plan to address only boater concerns, there should have been a master plan developed for this park. The existing pedestrian promenades and bike lanes have not been reviewed for current usage. This is especially true along the Inner West Harbor and Marina Blvd. If new gates and docks are designed according to existing parking layouts, any changes to the pedestrian promenade and parking layout to provide better access along the waterfront would make the new gate system obsolete. A Master Plan, taking the Bay Trail and pedestrian safety into consideration could affect harbor layout. (*Sue Chang, January 19, 2006*)

We find no mention of the City of San Francisco Bicycle Plan (1997, 2005) which defines and describes an official bicycle route (#2) passing through the West Harbor project area, nor do we find mention of the Bay Trail or its Plan, whose adopted alignment passes through, or is adjacent to, both the West Harbor and East Harbor project areas. The Bay Trail and SF Bicycle Route 2, in their existing condition, constitute an important multi-use non-motorized route enjoyed by thousands of people each week, and improvements to this route are a high priority for the SFBC and its partners. The Bay Trail alignment is a de facto element of San Francisco's Bicycle Plan and bike route network and as such, injuries and impacts to any portion of the Bay Trail constitute injuries and impacts to the city's bicycle route network. Bay Trail users include daily long- and short-distance bicycle commuters, local day-trippers, residents of the immediate neighborhood, and tourists from around the world, an aggregate constituency of significant size and diversity. Parking and driving space for private boat owners is not the "highest and best use" of the waterfront. (*Andy Thornley, San Francisco Bicycle Coalition, January 19, 2006*)

Response 9.1

The Bay Trail Plan, adopted by ABAG in July 1989, includes a proposed trail alignment, a set of policies to guide the future selection, design and implementation of routes, and strategies for implementation and financing. The Bay Trail provides easily accessible recreational opportunities for outdoor enthusiasts, including hikers, joggers, bicyclists and skaters. It also offers a setting for wildlife viewing and environmental education, and increases public respect and appreciation for the Bay. It also has important transportation benefits, providing a commute alternative for cyclists, and

connecting to numerous public transportation facilities (including ferry terminals, light-rail lines, bus stops and Caltrain, Amtrak, and BART stations).⁶

The Bay Trail traverses the San Francisco Marina, from Fort Mason on the east to Crissy Field/GGNRA on the west. Bay Trail maps of the San Francisco Peninsula identify the alignment of the trail through the project vicinity.⁷

While it is difficult to discern the exact alignment due to the scale of the map provided by ABAG, from east to west the Trail appears to follow the sidewalk on the northern edge of Beach Street as it leaves Lower Fort Mason near Laguna Street, and continues along the sidewalk on the northern edge of Marina Boulevard. The Trail continues along the Marina Green. The Trail then follows the sidewalk on the northern edge of Marina Boulevard adjacent to the Marina Boulevard Seawall, until the intersection with Lyon Street, where the Trail turns north connecting with an east-west trail into Crissy Field.

Many of the comments describe existing conditions of the Bay Trail, but do not necessarily identify inadequacies in the environmental analysis as related to the proposed project. To the extent that certain trail use deficiencies are currently present, they are existing conditions that would not be changed or substantially worsened by the proposed project. While the DEIR did not specifically address potential impacts to the Bay Trail, page III.A-8 of the DEIR states that the project, “would not disrupt or divide the physical arrangement of existing uses and activities on or adjacent to the site.” This would include all existing pathways and trails through and around the project site, including the Bay Trail.

Some of the comments also suggest that increased use of the marina resulting from the proposed project would create a conflict between those accessing the marina by automobile and Bay Trail users. Regarding potential effects due to increased traffic, as stated in the Initial Study (see DEIR Appendix A), as well as on page V-3 in the DEIR (Additional Comments or Clarifications in Response to Comments Received During Public Scoping), with fewer boats in the marina, and assuming that all tenants arrive by private automobile, the level of tenant-related automobile traffic is not expected to increase under project conditions, and could decrease with the reduced number of berths, resulting in fewer vehicle trips than under existing conditions. This decrease in trips could result in a decrease in user conflicts between those using the Bay Trail and harbor tenants accessing their boats via automobile. However, this decrease might be offset somewhat with increased day use of the hand boat launches. Instances of put-in/take-out use by owners of small craft are not expected to increase the number of tenant-related vehicle trips to/from the marina because those people currently drive to the marina to take their berthed craft onto the Bay. The only change would be that they would take the craft with them attached to their auto. Finally, the increased average length of slips by 6.5 feet under project conditions would not have a measurable effect on the average number of people on the boats, and as such, larger boats would not directly correspond to

⁶ Source: <http://baytrail.abag.ca.gov/overview.html>

⁷ See San Francisco Peninsula Bay Trail Map at the following site:
http://www.abag.ca.gov/bayarea_info/baytrail/maps/SF_Peninsula.pdf

substantially more vehicular trips at the marina. Therefore, the proposed project would not create a substantially new or worsened conflict between Bay Trail users and vehicles in the project area. Nevertheless, the increased activity in the area from the reintroduction of the boat hoist function creates an opportunity for clarification of the different activities in the vicinity.

Chapter V of the DEIR has been revised to include the following improvement measure related to the Bay Trail alignment in the East Harbor:

Improvement Measure OTHER-1 – Bay Trail Signage in the East Harbor

Provide signage or other directional materials as appropriate to indicate the location of the Bay Trail alignment on the marina property, particularly in the East Harbor area. Coordinate with the San Francisco Bicycle Coalition, the National Parks Service, the Fort Mason Foundation, Bay Trail project staff, and other appropriate interested parties in efforts to improve conditions for Bay Trail users on marina property, particularly in the East Harbor area.

Please see Response 9.3.

With regard to the comment about Bicycle Route 2 located on Marina Boulevard, the proposed project would make no changes to this existing bicycle route. The commenter’s description of the Bay Trail vis-à-vis the Bicycle Plan, and of the users of the Bay Trail, as well as the commenter’s opinion about uses of the waterfront, are noted.

COMMENT 9.2

Barriers potentially affecting public use. The Draft EIR proposes to further degrade these dangerous inadequate conditions installing “suitable barriers on boater-only [after-hours boater] spaces control access during the restricted parking period...” The proposal would give further benefits to the handful of boat owners who are allowed to park their cars next to their yachts for however long they like, to the detriment of all the recreational users of the Bay Trail. There is no discussion in the Draft EIR of the design of the barriers, but any physical barrier designed to keep unauthorized vehicles from parking on the Bay Trail will be a barrier and hazard to recreational users, as are a number of existing bollards and posts. (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

Parking Lots. As noted, the Bay Trail currently runs through East Harbor parking lots. Under “Landside Improvements,” the Draft EIR describes “access modifications to the parking lots.” There is no description of what those modifications might be. They are apparently different from installation of parking barriers, which are mentioned further along and in Table 2 under East Harbor, Parking element, to “Install suitable barriers on boater-only [after-hours boater] spaces to control access...” The Draft EIR is deficient in not disclosing the potential impacts of these inadequately described access modifications or barriers on the Bay Trail. (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

The DEIR does not adequately provide information on the Controlled Access gates – these were not evaluated for visual impacts or for affects on neighborhood parking. Nor were they evaluated for impacts

to pedestrians or cyclists along the Bay Trail. Question: How will controlled gates be implemented when many of the boater-only [after-hours boater] parking spaces share an access to the general public parking spaces? In the East Harbor, the boater only [after-hours boater] spaces share access to the Fort Mason parking lots. Please evaluate the use of controlled gates on pedestrian usage of the Bay Trail along Marina Blvd. (*Sue Chang, January 19, 2006*)

The Bay Trail at West Harbor is already too narrow for amount of trail traffic and is loaded with hazards, including a series of curbs running the length of the trail. The project proposes to add barriers to keep unauthorized cars from parking on Bay Trail right-of-way, creating more hazards. (*Andy Thornley, San Francisco Bicycle Coalition, January 19, 2006*)

Please specify the location, size, material and design of these [access control] gates. Please describe how the system will operate. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 9.2

As stated in the DEIR, the proposed barriers would be installed to restrict access to designated after-hours boater parking spaces during the restricted parking period (from 10:00 p.m. to 6:00 a.m., daily, when the marina is closed). While final design plans for the barriers are not currently available, it is reasonable to assume that access control barriers would be located in the auto travel lanes of the parking lots, and not within the Bay Trail alignment, or on any of the sidewalks that hikers, joggers, bicyclists and skaters use, and therefore would create no hazards to those users of the Trail. The barriers would have a negligible effect even on people using the trail during night-time hours. It is also reasonable to assume that the automatic gates would be in the “up” position during daytime hours, allowing pedestrians to walk freely around the gate posts were they to circulate through the parking lots themselves.

COMMENT 9.3

Without cars, the width of the Bay Trail along the Marina Seawall is adequate for trail users. The existing condition, with cars, makes it inadequate and dangerous. Additional barriers would further constrain public use, in effect further privatizing a public facility. (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

Public Access Dock and Public Hand Boat Launch and Guest Dock. These facilities, shown respectively as items 13 and 7 on the Proposed Site Plan, abut a portion of the shoreline Bay Trail which has been excluded from the Project boundary. What impacts on the Bay Trail that these additions would have cannot be determined from the inadequate description of the Draft EIR. For example, would trailering, launching or loading activities cross the Bay Trail? (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

Boat Hoist. At the south end of the East Harbor, the Bay Trail runs through a 13,600 square foot area which the Draft EIR claims is a former boat trailer storage area, and crosses directly in front of the currently non-functioning boat hoist. The Draft EIR proposes to make the boat hoist functional, which

means that boats, cars and trucks will be crossing the Bay Trail. The Draft EIR says the storage area “has the capacity to hold about 24 trailered boats at one time. Once the boat hoist has been renovated, it is expected that trailered boat storage would return on a daily basis, and that some owners of the small craft currently berthed at the marina would convert to put-in/take-out use.”? The Draft EIR fails to identify the impacts of reactivation and use of this facility on the Bay Trail which, on their face, will constitute a major hazard to Bay Trail users, as well as apparent displacement or appropriation of the Bay Trail alignment. The Draft EIR fails to offer alternatives which would reduce or eliminate these impacts. The Draft EIR fails to identify mitigations to the impacts. (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

The proposed boat trailer parking in the East Harbor area will sit directly on top of the Bay Trail. The project proposes to activate a boat launch at East Harbor, creating truck, car and boat traffic across existing Bay Trail alignment. (*Andy Thornley, San Francisco Bicycle Coalition, January 19, 2006*)

The Preliminary Negative Declaration that was prepared for this project prior to the decision to prepare a full Environmental Impact Report made reference to improving 4,800 linear feet of this segment of Bay Trail. For some reason, these proposed improvements were dropped from the project description for the DEIR. While the proposed improvements would not have entirely solved the safety issues related to the Fort Mason pathway at Laguna/Marina and the east harbor parking lot, they were an opportunity to at least temporarily address a serious safety issue. It is our hope that the FEIR will return these improvements to the project description. If this is not possible, we would like to work with you and other City departments to address this issue in another forum. (*Maureen Gaffney, San Francisco Bay Trail, October 19, 2005*)

SFB is convinced that reasonable solutions can be found if all parties work together. The Project offers an opportunity to achieve consensus. We suggest that mitigation of project impacts include a process that would convene all affected stakeholders to determine how to make the Bay Trail safe and accessible in this area. The work product would be a funded plan which would have to be implemented before construction of the Project could begin. The plan would include, without limitation, adequate signage, striping and consideration of alignments in addition to the shoreline alignment, in order to optimize Bay Trail use. (*Dee Dee Workman, San Francisco Beautiful, January 18, 2006*)

As mitigation for these significant impacts to an existing shoreline recreational amenity, The Bay Trail Project requests that a planning effort be undertaken to address these issues. The planning group should include relevant stakeholder agencies and groups such as the Fort Mason Foundation, the National Park Service, the San Francisco Bicycle Coalition, San Francisco Beautiful, BCDC, Bay Trail Project, and others. (*Maureen Gaffney, San Francisco Bay Trail, January 19, 2006*)

The project should remove safety hazards on the Bay Trail such as pipes, poles, and posts, as well as removing or mitigating railroad tracks. (*Andy Thornley, San Francisco Bicycle Coalition, January 19, 2006*)

While it may or may not be a part of this project, the pedestrian access from Fort Mason to the East Harbor is awful and at level of service F. The tunnel from Fort Mason has a wall which encroaches and

necks the sidewalk down to an unusable state. One stroller blocks the entire width. This access is much used by cyclists (who should be in the street), joggers, walkers, and kids, and many times people are forced out into the street, which is very narrow and has ZERO shoulder. It's dangerous, and an unnecessary inconvenience. I have witnessed several altercations over right-of-way there myself. I would rate it a higher priority than any improvement in this EIR, and to the extent that this project will exacerbate the situation, one that should be improved as part of this project. (*Brian W. Veit, October 17, 2005*)

The project description references new informational and directional signage that is to be installed as part of the proposed project. The Bay Trail Project provides signage free to public agencies and would like to assist the Department of Recreation and Park with the preparation of a signage plan for the Marina. Once an appropriate solution to the circulation issue in the East Harbor is identified, well-placed signage can be an invaluable tool in directing the public to the appropriate areas within the Marina while also providing the best possible shoreline experience. While planning for the East Harbor circulation issues is underway, Bay Trail planners would like to work with the City to install Bay Trail signage along the existing pathway on the Marina Green and in front of the West Harbor. (*Maureen Gaffney, San Francisco Bay Trail, January 19, 2006*)

Response 9.3

Regarding the proposed boat trailer parking and renovated boat hoist in the East Harbor area, there is no indication on the above-cited ABAG map that the Trail traverses the parking lot adjacent to the boat hoist. See also Response #9.1. Nevertheless, under current conditions it is apparently unclear to trail users in this vicinity where the Bay Trail alignment is located. There are no signs or pavement markings in this area or in any area of the marina showing the alignment of the Bay Trail. The lack of existing access to the boat hoist area would indicate that this area is not in the Trail alignment. It is reasonable to presume that, as stated above, the Trail follows the sidewalk on the northern edge of Beach Street as it leaves Lower Fort Mason near Laguna Street, and continues along the sidewalk on the northern edge of Marina Boulevard'.

Under conditions whereby boat trailer parking would be provided in this East Harbor area, potential conflicts could occur with hikers, joggers, bicyclists and skaters if the latter were to travel across the parking area. There is a sidewalk that runs beneath the currently non-functional boat hoist and along the northernmost edge of the parking lot, which does not appear to be part of the Bay Trail system. The hoist's maximum "throughput" capacity is about 24 launches/pull-outs a day. See page 22 of the Initial Study for more detail on the expected use of the boat hoist and associated parking area. Expected wintertime use of the boat hoist would be far less than its maximum capacity would allow. The frequency and duration of this conflict with use of the sidewalk would be considered an inconvenience, not a significant environmental impact, to people who would use that sidewalk.'

While no significant traffic hazards related to the future use of the boat hoist area on Bay Trail users at the marina are anticipated, the increased activity in the area and the lack of clear directional signage creates an opportunity for implementation of the following improvement measure, as described in Section D of this document, Staff Initiated Text Changes:

“Provide signage or other directional materials as appropriate to indicate the location of the Bay Trail alignment on the marina property, particularly in the East Harbor area. Coordinate with the San Francisco Bicycle Coalition, the National Parks Service, the Fort Mason Foundation, Bay Trail project staff, and other appropriate interested parties in efforts to improve conditions for Bay Trail users on marina property, particularly in the East Harbor area.”

COMMENT 9.4

Renovation of the boat hoist in the East Harbor will significantly impact Bay Trail users as construction and service vehicles cross and obstruct the trail several times a day. (*Andy Thornley, San Francisco Bicycle Coalition, January 19, 2006*)

The Final EIR must identify, discuss, and potentially provide mitigation for temporary impacts to the Bay Trail during construction. This is particularly important as the proposed construction schedule for the project is three-years long. The one mile section of Bay Trail found within (and between) the San Francisco Marina Renovation project study area is one of the most heavily used of the existing 270 miles of trail in a nine-county region. A three-year construction timeframe will undoubtedly affect users on this already impacted section of trail. Please provide detailed information in the Final EIR regarding potential trail blockages and detours, and what measures will be incorporated to reduce these impacts to a less-than-significant level. (*Maureen Gaffney, San Francisco Bay Trail, January 19, 2006*)

Response 9.4

Regarding temporary impacts to the Bay Trail during project construction, potential impacts are addressed in the Initial Study (see DEIR Appendix A), as well as on page V-3 in the DEIR (Additional Comments or Clarifications in Response to Comments Received During Public Scoping). As described in these sections, the project’s ultimate design and construction bidding process would determine the most feasible construction methods. Although it is expected that many of the heavier construction materials to be used at the marina would be brought in by barge, the exact construction methods or the mode of travel by which materials and workers would be transported to and from the site have not been established. In order to define measures to reduce temporary impacts during the construction period, as part of the review process leading up to project construction, the project sponsor is committed to traffic management coordination and will take actions to minimize disruption associated with construction, including potential disruption to the Bay Trail. As a result, no significant construction traffic impacts associated with the proposed project are expected.

COMMENT 9.5

The final EIR (FEIR) should include a tailored discussion of how the proposed project relates to the Bay Trail Plan and Policies, and what impacts to current or future use of the Bay Trail may occur due to increased traffic, a rerouting of traffic patterns, temporary impacts/closures during construction, views of the Bay from the Trail, and connectivity of the trail to segments to the north and south of the project area. (*Maureen Gaffney, San Francisco Bay Trail, letter, October 19, 2005*)The DEIR appropriately references

several policies and objectives of the San Francisco General Plan, six of which are directly applicable to the Bay Trail. The Marina Renovation Project should examine the proposed project in the context of these policies. (*Maureen Gaffney, San Francisco Bay Trail, January 19, 2006*)

Response 9.5

Applicable Bay Trail policies include Trail Design Policies 13. “Wherever possible, new trails should be physically separated from streets and roadways to ensure the safety of trail users.

Discussion: The possibility of conflict between automobiles and trail users is a serious safety concern. Where creation of a Class I path is feasible, this design is preferred.”

The Planning Department and Department of Recreation and Park agree that Trail Design Policy 13 is a sound policy for the construction of new trails. While the proposed project would not make any changes to the existing network of paths in the project vicinity, nor construct any new trails, the proposed project would not preclude such improvements if they were to occur in the future. If such plans for new trails at the marina were to be developed at a later date, however, Policy 13 would be taken under advisement.

COMMENT 9.6

Of course, the Fort Mason Center is adjacent to the project. Our concerns include the Muni E-line extension that we’re working on... (*Suzanne Lifson, Public Hearing Transcript, October 6, 2005*)

The DEIR (at page S-4) proposes using 13,600 square feet of the East Harbor parking area for the storage of 24 boats on trailers. On page III.B-7 the DEIR discusses proposed plans to extend the Muni E-line through the tunnel under Fort Mason, with a turn around at the end of the tunnel - possibly on the East Harbor parking area. Sufficient consideration not been given to the fact that the E-line turn around could use space planned for the trailer boat storage. (*Alan Silverman, Marina Community Association, January 18, 2006*)

There is a proposal to extend the Muni ‘F’ trolley from Fisherman’s Wharf through a tunnel under Fort Mason which daylight just south of the automobile entrance to Fort Mason. This will require detailed study before funding is found for this proposal. But, an early alternative had the trolley looping through the parking lot back to the tunnel. We suggest instead a rail route which has a single track running from the tunnel to the north bound curb lane of Marina Boulevard with a return loop at the Buchanan Street entrance to the Marina parking lot. The rail near the curb on Marina Boulevard would operate with two way traffic and this would require the elimination of some parking and a separation from opposing auto traffic. (*Howard Strassner, Sierra Club San Francisco Group, January 17, 2006*)

Response 9.6

The Muni E-line is discussed on page 26 of the Initial Study, and is summarized here. Construction of that transit enhancement project, if approved and funded, would not likely begin until well after completion of the proposed improvements to the East Harbor. As a result, no cumulative construction impacts are expected. The Muni extension, if completed to the western edge of the

Fort Mason Center, would provide an additional alternative to the private automobile in the project vicinity, potentially decreasing use of the private automobile in the project area as people switch from private automobile use to public transit. As discussed in the Initial Study, one of the turnaround concepts envisioned would utilize a small portion of the project site immediately south from Marina Boulevard and within the existing East Harbor parking lot, possibly displacing about 30 parking spaces in this area, but with no direct conflicts with the proposed trailered boat storage area or the renovated boat hoist. As a result, no significant cumulative traffic impacts are anticipated as a result of the proposed project's reuse of the boat hoist and trailered boat storage area.

In March 2006, GGNRA initiated an environmental impact statement (EIS) process for an extension of the MUNI historic streetcar service from Fisherman's Wharf to the Fort Mason Center. One or more of the turnaround options extend into the City of San Francisco's parking lot located to the west of the Fort Mason Center, potentially within the East Harbor parking lot on City property. The EIS will evaluate the E-Line extension terminating in the vicinity of Fort Mason. Any possible future extension of Muni's historic streetcar to the Presidio is not proposed as part of the Extension of San Francisco Municipal Railway's Historic Streetcar EIS project. Any future extension would be subject to a separate proposal and environmental review process.

COMMENT 9.7

Which also I think, does not address –and I will make this last– it doesn't address traffic impacts. You are going to take 24 boats out of the water. They are going to become put in and take out boats and that potential traffic impact of cars pulling trailers along the Marina Boulevard I don't think are addressed. You are also going to – they are also going to repair the boat launch docks at both harbors which is going to increase the number of people that come there just to boat launch, not to use the trailer launch where it holds 24 trailers, but to bring their boats over and launch them there. It doesn't do an analysis of what that increase would be. It doesn't do any kind of traffic impact on that. And so I am troubled by that. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

Response 9.7

The concern raised by the commenter (reduction of the total number of berths) is discussed on pages 22 and 23 of the Initial Study. As described, with fewer boats in the marina, and assuming that all tenants arrive by private automobile, the level of tenant-related automobile traffic is not expected to increase under project conditions, and could decrease with the reduced number of berths, resulting in fewer vehicle trips than under existing conditions. However, this decrease might be offset by increased day use of the hand boat launches. Instances of put-in/take-out use by owners of small craft (currently berthed at the marina, but potentially switching to day use under the proposed project), are not expected to increase the number of tenant-related vehicle trips to/from the marina because those people currently drive to the marina to take their berthed craft onto the Bay. The only change would be that they would take the craft with them attached to their auto. Therefore, no additional vehicle trips would be made to the marina.

While the proposed project would not increase the number of vehicle trips to or from the marina, some of the existing tenants who currently drive to the marina by auto would now arrive by auto pulling a trailered boat, which are longer (by about 20-25 feet) and potentially slower/less maneuverable than automobiles without boat trailers. As the renovated boat hoist would have a maximum through-put capacity of 24 put-ins/take-outs per day, this could result in an increase of about 48 daily one-way trips of automobiles hauling trailered boats in the East Harbor vicinity. Considering that no more than about 50 boats out of the current 628 depart from the marina on a summer weekend,⁸ the use of the boat hoist would likely be substantially less than the maximum capacity it would provide. Although unlikely to occur on a single day, the addition of 48 new daily trips focused on the intersection of Marina Boulevard/Beach/Buchanan Streets would be spread out throughout the day and would not be sufficient to degrade the existing level of service (LOS) B (weekday PM) or LOS C (Saturday midday) to an unacceptable level, as described on page 23 of the Initial Study. Therefore, the traffic impacts of additional trailered boats in this area would be less-than-significant.

COMMENT 9.8

Where will I park under proposed plan that removes all parking on East West mole? When parking is mitigated for in new plan, please show on map where it will be relative in distance to where it is currently. (*Will LeRoy, undated*)

Is it the intention of this plan to ignore ADA law by removing handicapped parking, and or egress and ingress by way of removal of East West Mole? (*Will LeRoy, undated*)

Why is the general parking removal (a dozen spaces) not mentioned in this draft EIR (located a top the East West mole)? These were the most used anywhere in the system. (*Will LeRoy, undated*)

The EIR report is flawed. On page 23 it says “the number of parking spaces will remain the same.” When they eliminate the east-west mole behind the harbor master’s office it contains 15 parking spaces, including two handicap spaces and those probably are the most used because they are in a secure area. Those are eliminated, they are not addressed in the report. When you convert from smaller boats to larger boats, small sailboats have one to two person crews on it. Big power boats have four to six to ten people on it. You’re going to have increased people coming in. Where are they going to park? You’re eliminating parking spaces and you got increased number of usage. Also, with the planned boat ramp. This will be the most desirable boat ramp in the Bay Area, it’s right next to the Golden Gate bridge. You’ve eliminated all the 24-foot boats so they’re going to be using the boat ramp. So where are all these boat ramp people going to park? Right? You’re eliminating spaces. (*Rene Monchatre, Public Hearing Transcript, October 6, 2005*)

Removal of the East/West Mole that is West of the Harbormaster’s Office: I oppose the removal of this mole. It provides a valuable calming barrier for the waters in the west harbor. It also is the only place in the entire marina where tenants can find secure parking. Boaters frequently spend several days away

⁸ Personal communication, Brad Gross, San Francisco Marina Harbormaster, with Brad Brewster, ESA, August 25, 2006.

from the harbor on their boats. They must park their cars around the marina area overnight for several nights. This mole provides secure parking behind a locked gate and it is the only place in the harbor that does so. I normally park my car near my boat along Marina Blvd. When I leave for a night or more, I move it to this mole because of the security it provides. Cars parked all night long along Marina Blvd are subject to vandals. *(Bruce Munro, January 16, 2006)*

Some marinas give one parking space for each berth rented yet this plan, while it states no change in parking, removes the most critical parking to central and most populated dock. Why is there no mention of East West mole parking removed in this plan? While this plan proposes no change in parking, if it is the same as current it will issue two permits for each of the 628 proposed berths and ‘assumes’ they will all park in a mere 208 spaces. That’s not including visiting boats, or added usage such as boat ramp, hand boat ramp, commercial charters, and added passengers and crews for larger proposed boats. There is also the issue of how this plan pools all parking spaces together which ‘assumes’ boaters will walk from across the harbor (roughly half a mile) or all the way from Gas Light Cove to West harbor or vice versa. Boaters are not tourists or shoppers who can simply turn around and go home. They have a responsibility to see to it that their boats are maintained on a schedule. What is in this plan that saves the public recreation area from absorbing needed new boat parking. Please show on a map where parking is proposed for the 66 new berths proposed to locate at the central dock off the East West mole. Please show handicapped places as required in same. Since currently, park vehicles use no parking zones, is it acceptable to ‘assume’ they don’t need any parking spaces as plan suggests? Please designate on map where the marina maintenance vehicles will park at night and where they will park at peak usage while serving areas away from proposed office such as distant docks, ramps and rest rooms. *(Will LeRoy, undated)*

Thirdly, restriping of the parking lots is not defined, adding parking would be against the city’s general plan, which states that land uses which can be located other than on the shoreline should be. *(Joan Girardot, Public Hearing Transcript, January 12, 2006)*

The Project proposes “restriping of existing parking lots, but also proposes there will be no increase in parking spaces. Please define “restriping.” Where will this occur? What is the purpose if not to add parking spaces? *(Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006)*

Response 9.8

The number of parking spaces at the marina would not change under the proposed parking reconfigurations. Restriping of the existing parking lots is one component of the planned improvements to the existing parking areas, including new access control barriers for after-hours boater parking, as described in the Project Description of the DEIR (page II-11). One intent of the restriping is to replace parking spaces lost from the proposed removal of the east-west mole. While the design and exact location of the restriping effort has not been finalized, it is anticipated that the existing 18 after-hours boater parking spaces, including two handicap-accessible spaces, which sit atop the east-west mole would be relocated to other after-hours boater parking areas in the West Harbor as part of the lot improvement efforts. This project component would be required to comply

with ADA requirements. It is envisioned that these existing spaces on the mole would be recaptured through the consolidation and more efficient use of the existing after-hours boater parking areas as part of the restriping effort. The after-hours boater parking areas would be accessed through new control barriers (i.e., automatic gates), possibly using a magnetic card system issued to harbor tenants. Currently, these spaces are designated as ‘after-hours boater’ spaces, but no access controls are in place to prevent non-boaters from parking there. The overall number of parking spaces at the marina, either for boaters or non-boaters, is not anticipated to change as a result of the proposed project.

Some of the commenters also asked for a map depicting the existing and proposed location of handicapped, loading, and maintenance spaces. The commenters’ opinions about the proposed project are noted, but because they do not relate to the adequacy of the environmental review, no further response is warranted in this document.

Furthermore, San Francisco does not consider parking supply as part of the permanent physical environment. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project’s social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (CEQA Guidelines §15131[a].) The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City’s “Transit First” policy. The City’s Transit First policy, established in the City’s Charter Section 16.102 provides that “parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation.”

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, but assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in

the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably address potential secondary effect.

COMMENT 9.9

Please be advised that any work or traffic control within the State ROW will require an encroachment permit from the Department. To apply for an encroachment permit, submit a completed encroachment permit application, environmental documentation, and five (5) sets of plans (in metric units) which clearly indicate State ROW to the following address: (*Timothy C. Sable, Department of Transportation, September 20, 2005*)

Response 9.9

No work is anticipated within the State right-of-way as part of the proposed project. However, if that were to change, the City and County of San Francisco would consult with Caltrans staff to resolve concerns related to any such work requiring encroachment permits.

COMMENT 9.10

The DEIR is defective for its failure to properly address a host of issues, e.g., traffic and noise and vibrations during construction (An EIR is required even in those situations where the impacts are temporary, such as those caused by pile driving, truck hauling, etc., during construction. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d.68.), the placing of fill in the Bay for breakwaters, the reconstruction of the Degaussing Station on the Marina for commercial use, etc. (*Ronald J. Mulcare and Edward J. Barrett, September 27, 2005*)

Response 9.10

This comment is addressed in this subsection of the document because it mentions potential construction traffic impacts in particular, although other environmental topics are also discussed. Construction impacts of the proposed project, in terms of traffic, noise, and vibration, are provided primarily in the Traffic and Noise sections of the Initial Study. The traffic, parking, and circulation impacts of the proposed project are addressed in the Initial Study (see DEIR Appendix A), as well as on page V-3 in the DEIR (Additional Comments or Clarifications in Response to Comments Received During Public Scoping). As described in these sections, no significant construction impacts associated with the proposed project were identified, with the exception of pile driving. Construction activities would be required to comply with the San Francisco Noise Ordinance, which includes requirements that prevent construction-related noise from creating a significant impact. Mitigation Measure 1 – Noise, on page 71 of the Initial Study, describes how the project contractor would be required to implement a number of noise reducing strategies and limits on the timing of pile driving activities to reduce construction-related noise impacts of pile driving.

Potential impacts associated with Bay fill are discussed in Section III.D, Soils, Geology, and Seismicity, as well as Section III.E., Hydrology and Water Quality. Bay fill is also addressed in the

Biology section of the Initial Study on page 36. As described in these sections, no significant impacts related to fill are anticipated as a result of the proposed project.

Finally, with regard to commercial uses at the marina, reactivation of the Degaussing Station for use as the Harbor Master's Office would be a municipal, not commercial use.

COMMENT 9.11

You do not provide a traffic study. A traffic study is necessary, because the project components in the East Harbor create the classic CEQA case of "overcrowding" at the entrance to Ft Mason. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

It can reasonably be assumed that the significant increase in the number of berths for large yachts in the proposed Project will signify an increase in passenger, guest and crew vehicle trips to the harbor. The new commercial use of the harbor will bring dining cruises and sightseeing boats and other types of commercial boats utilizing the free parking in the lots for passenger pickup and dropoff at the proposed new guest dock. This also may mean a significant increase in vehicle traffic in the area. Fort Mason is predicting a significant increase in visitation and vehicle trips passing through the East Harbor lots to access the entrance, to Lower Fort Mason; the addition of a working public boat hoist and new hand boat launches; the installation of so-called parking control gates and an as yet undefined parking control system and paid parking; trailered boats being pulled in and out of the parking lots and queuing for use of the hoist; the expected extension of the MUNI E Line, its turn-around in the East Harbor parking lot, together with accommodation of the MUNI 28 Line all point to the need for a traffic study as part of the EIR. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 9.11

The traffic, parking, and circulation impacts of the proposed project are addressed in the Initial Study (see DEIR Appendix A), as well as on page V-3 in the DEIR (Additional Comments or Clarifications in Response to Comments Received During Public Scoping). As described in these sections, no significant traffic or parking impacts associated with the proposed project were identified based on the changes in traffic conditions which could result from the proposed project.

Because the average berth size would increase from 32 to 38.5 feet, and because the number of total berths would decrease from 668 to 628, the traffic analysis assumes that traffic may decrease with implementation of the project, even when the additional trips which could be generated by the boat hoist are considered. Cumulative impacts associated with traffic are addressed in the Initial Study (see DEIR Appendix A), as well as on page V-3 in the DEIR (Additional Comments or Clarifications in Response to Comments Received During Public Scoping). As described in these sections, no significant cumulative traffic impacts associated with the proposed project were identified, and as such, no detailed traffic study was warranted. Please also see Response #3.1 regarding commercial dock fees.

COMMENT 9.12

Shall it be only assumed no one will try to get around the two hour parking for their boat trailer? Could it be assumed they will park trailer in neighborhood, returning in a second vehicle. Let's not 'assume' a parking ticket will solve a situation where we make a boat ramp we don't really want people to use because of inadequate parking. (*Will LeRoy, undated*)

Response 9.12

The comment refers to a parking enforcement issue, and does not relate to the adequacy of the environmental review.

COMMENT 9.13

Inadequate: The DEIR did not evaluate the environmental impact associated with increased levels of activity at the currently vacant Degaussing Station. Increases in vehicular traffic and in Harbor Staff Vehicles on the open shoreline are significant negative effects. In addition, on July 12, 2005 legislation was passed by the Board of Supervisors that repealed Section 12.11 of the San Francisco Park Code and adopted a new Section 12.11. The new Section 12.11 includes several new Parking Fees and new Commercial Dock Fees that could significantly increase the use of the new Harbor Office. (*Sue Chang, January 19, 2006*)

Response 9.13

As the existing number of Harbor Office staff would shift from the existing Harbor Office to the renovated Degaussing Station, no significant traffic or parking impacts are anticipated with this project component. Please also see Response #3.2 regarding commercial dock fees.

COMMENT 9.14

Inaccurate: Parking: In both the West Harbor and the East Harbor, the numbers of boater-only [after-hours boater] parking spaces is incorrect. A verified count of general spaces for each area should be completed. (EIR states 301 total boater only spaces, the actual count is 243). Accurate: The West Harbor contains 150 boater-only spaces and the East Harbor has 93 boater only spaces, for a total of 243 boater-only spaces. This is significant because recent fee legislation (CCSF Ord. 0162-05) includes a new fee allowing harbor tenants to purchase additional permanent parking permits and allows non-berth holders to purchase temporary parking permits for boater-only spaces. This Draft EIR should fully evaluate the new parking fee legislation. (*Sue Chang, January 19, 2006*)

Inaccurate: The number of boater-only parking spaces reported in the DEIR is inaccurate. Question: Please certify by independent agency the correct the number of boater-only [after-hours boater] and general parking spaces. (*Sue Chang, January 19, 2006*)

“Special Event” parking fees – this allows the harbor to block off existing free public parking spaces in order to collect fees for special events in the area. How will this relate to the proposed controlled access gates, and how will it affect the neighborhood as it reduces the number of free spaces for park users, or as

special event attendees attempt to avoid parking fees and look in the neighborhood? It has already been noted that valet vans are traveling through the parking lots at unsafe speeds between the harbor lots and the various Fort Mason venues. How will controlled gates affect these operations? (*Sue Chang, January 19, 2006*)

Trailer/dingy parking \$7.50/day - Is this in the parking area near the hoist or is there another designated area? Will this impact parking for boaters or other park users? Temporary Parking permit - \$7.50/day – This allows non-harbor tenants to purchase parking permits that will allow parking in previously harbor tenant-only parking. Will this force boaters and/or other park users into the neighborhood in search of free parking? (*Sue Chang, January 19, 2006*) Further in the same legislation the Board established a paid parking use of the shoreline, public parking at \$ 7.50 a day, special events \$ 7.50 a day, trailer and dinghy \$ 7.50 a day. The impacts of this change of use for random parking to a paid operation, combined with the new use for trailer and dinghy parking, combined with the new trailered boat operation at the new boat hoist, must be evaluated in the final Environmental Impact Report. It should be obvious we need a traffic impact analysis to be included in the final report. (*Lois Rosano, Public Hearing Transcript, October 6, 2005*)

Response 9.14

Potential traffic, circulation and parking impacts are addressed in the Initial Study (see DEIR Appendix A), as well as on page V-3 in the DEIR (Additional Comments or Clarifications in Response to Comments Received During Public Scoping). As described in these sections, no significant traffic or parking impacts associated with the proposed project were identified, including impacts associated with paid parking or trailered boat operations. Traffic analysis was completed during the preparation of the Initial Study and this analysis was the basis for the determination that there would not be significant traffic, parking, or circulation impacts resulting from the proposed project.

The parking numbers provided in the Project Description of the EIR (see Table 2, Proposed Landside Improvements, page II-10) were provided by the project sponsor and are considered adequate for environmental review purposes. Neither the proposed project nor the change in parking fees would change the number of existing parking spaces at the marina. The February 2005 proposal to change the marina parking fees is addressed on page V-3 of the DEIR. As described in the DEIR, no significant impacts to traffic or parking are anticipated as a result of a potential future change in the parking fee structure at the marina. See also Response #3.2 regarding commercial dock fees, which noted that for-sale permits for non-tenants are only for use while participating in boating-related activities.

See Response #9.2 regarding a general description and potential effects of the proposed access control gates. As noted above, controlled access to the after-hours boater parking area would occur between 10pm and 6am, as under current conditions, with the addition of physical barriers to restrict overnight public parking in these areas. Similar to existing conditions, after-hours boater parking would be provided on a space-available basis. Special events typically occur during the day, and would typically end before 10 pm. As such, the controlled access parking areas would not

substantially restrict parking at the marina during special events to the extent that people would be required to find parking in the adjacent neighborhoods, resulting in a significant traffic impact.

COMMENT 9.15

Inadequate: Clarification is needed as to the intention of the trailer parking near the renovated hoist. The DEIR states that there is no trailer parking except for in an area by the hoist in the East Harbor. This appears to be incorrect, as there is trailer parking in the West Harbor lots by the St. Francis. Question: Where is the designated area by the hoist that is intended for trailer and boat storage? Is it for permanent dry storage of boats on trailers, or for daily use only? What is the square footage of the designated area? How many cars and trailers will fit in the designated area? If the area is currently under lease with City Yachts, what is the likelihood that the area will be available for public use? Why was a traffic study not conducted as it relates to the possibility of traffic backups associated with the renovation of the hoist? (*Sue Chang, January 19, 2006*)

Response 9.15

A small number of trailered boats (around three boats) are temporarily parked just outside of the project boundaries on land leased by City Yachts. Currently, there are no designated trailered boat parking lots on the park land managed by the San Francisco Department of Recreation and Park. New trailered boat parking would occur in the East Harbor adjacent to the existing boat hoist, which would be renovated, and the lot reopened to trailered boat parking. Existing dry storage of approximately 24 boats at the St. Francis Yacht Club would continue under the Yacht Club's lease.

As described in on page V-3 in the DEIR (Additional Comments or Clarifications in Response to Comments Received During Public Scoping), and in the Traffic and Circulation Section of the Initial Study, no significant traffic or parking impacts associated with the proposed project, including reuse of the boat hoist area, were identified. See also Response #9.7.

COMMENT 9.16

Do the number of parking spaces stated for the East Harbor and the number of spaces stated for the West Harbor include the parking spaces to the north of the Marina Green itself? Are there any parking spaces not included in the stated counts? (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 9.16

The number of parking spaces stated in the DEIR for the West Harbor include those north of the Marina Green. Parallel parking spaces along Marina Boulevard are not included in the stated counts. Parking spaces within the marina parking lots are included in the stated counts.

COMMENT 9.17

The General Plan states that the shoreline is the City's most important natural asset. Public shoreline recreational open space is the most prized category of land use in the City. The General Plan discourages shoreline land uses which by their nature do not require a shoreline location, and encourages such uses to be located away from the shoreline. Parking is one of these. Please describe how parking at the Marina Green as a shoreline land use in public open space satisfies the mandates of the General Plan. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 9.17

As stated on DEIR page III.A-5, a conflict between a proposed project and a General Plan policy does not, in itself, indicate a significant effect on the environment within the context of CEQA. Any physical environmental impacts that could result from such conflicts are analyzed in this EIR. In addition to considering inconsistencies that affect environmental issues, the Planning Commission considers other potential inconsistencies with the General Plan, independently of the environmental review process, as part of the decision-making process for a proposed project. Any potential conflict not identified in this environmental document would be considered in that context, and would not alter the physical environmental effects of the proposed project that are analyzed in this EIR.

For informational purposes, it is noted that parking spaces at the marina are what would normally be considered "accessory" use; that is, they are part of the overall use of the shoreline by the marina, a use that necessarily must be located on the shoreline. Parking spaces supporting that use need to be located in close proximity to the activities they support.

COMMENT 9.18

If you have larger boats, you are going to have traffic impact because you have to sometimes take the boats out of the water. (*Bill Lee, Public Hearing Transcript, October 6, 2005*)

And then you got more of the harbor traffic because larger boats are tougher to steer than smaller boats, do you increase the rate of accidents there? (*Commissioner Bill Lee, Public Hearing Transcript, October 6, 2005*)

Response 9.18

As described in the DEIR Project Description, the number of slips at the marina would be reduced, but the lengths of the proposed slips would increase by an average of 6.5 feet, which for purposes of conservative analysis, was assumed to correspond to a 6.5 foot increase in average boat size at the marina. Considering that most boats at the marina remain in the water year round due to the mild weather (i.e., the harbor does not ice over in the winter), and that larger boats are more difficult to remove from the water and store on land than smaller boats, the tendency would be to keep boats in the harbor. The boat hoist is expected to be used for smaller boats whose owners may

choose dry storage instead of, or while waiting for, an available slip. As such, there would not be a significant traffic impact resulting from the hauling-out of potentially larger boats.

While the comment regarding the maneuverability of larger boats versus smaller boats is noted, the proposed project would reduce the overall number of slips in the harbor, and no substantial change in the average number of boat trips per day is anticipated under project conditions. The reorientation of the slips is also intended to increase ease of use and docking for boaters. As noted on page 34 of the Initial Study, boat trip activity is seasonal at the marina, averaging 5 boat trips per week during the winter months (November to April) and as much as 17 boat trips per day in the summer months (May to October). There is no reason to believe that the average number of boat trips would change substantially from existing conditions. In addition, larger boats are generally no harder to maneuver than smaller boats due to the twin engine and/or bow thrusters typically found on larger craft. Therefore, one would also not expect any effect on the rate of accidents related to the potentially increased size of the boats under project conditions.

COMMENT 9.19

A 40 million dollar plan, break water, even the boat launch. I can see the back up traffic going all the way down Buchanan Street because everyone would love to access the bay. (*Gloria Fontanello, Public Hearing Transcript, January 12, 2006*)

Response 9.19

The commenter's opinion about possible traffic impacts resulting from the proposed project is noted. Potential traffic and circulation impacts are addressed in the Initial Study (see DEIR Appendix A), as well as on page V-3 in the DEIR (Additional Comments or Clarifications in Response to Comments Received During Public Scoping). As described in these sections, no significant traffic impacts associated with the proposed project were identified. Please also see Response #9.7 regarding the hoist's maximum "throughput" capacity, which would be about 24 launches/pull-outs a day, generating a maximum of 48 one-way trips per day.

10. ALTERNATIVES

COMMENT 10.1

Please include in the EIR the following alternative specific alternative to be assessed: Do the necessary dredging and sand mining. Repair and make replacements as needed to the existing facilities with the existing layout and the existing berth size distribution. Put concrete or stainless steel sleeves on salvageable piles as an alternative to removal of those piles. Demolish the degaussing station and restore the site to open space (as provided and promised in the original conditional use permit issued by the City to the US Navy). Do not construct a maintenance building on the East Green, but continue to rely on the Structural Maintenance Division facility in GG Park. Leave the historic Scott Street moles intact. Do not build breakwaters north of the Marina Green. Remove and do not replace the berths in the Outer West Harbor. Construct a breakwater in the East Harbor, pending environmental and engineering review. Do not create trailered boat storage space on the public shoreline. Do not install paid parking. Seismically

retrofit the Marina Blvd and Fair's Seawalls. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

As you know, CEQA demands a reasonable range of alternatives, and in fact regulation 15126a says that an EIR shall describe a range of reasonable alternatives which would feasibly obtain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and it goes on to specify this. We have given you here a repair and replace alternative. (*Joan Girardot, Public Hearing Transcript, October 6, 2005*)

And I request that the Planning Commission require the repair and replace alternatives suggested by Marina Civic Improvement and Property Owners be evaluated for environmental impacts and its ability to meet the project sponsor's objectives. (*Sue Chang, Public Hearing Transcript, October 6, 2005*)

I feel the Commission should consider and recommend repairing and making replacements as needed to the existing harbor facilities. With the existing layout and existing berth sizes. I wish the Commission to do the necessary--suggest the Commission do the necessary dredging and sand mining. There should be no new building construction or building additions. No additional west harbor breakwaters and to seismically retrofit the Marina seawall and the Fair's seawall. (*Don Wissing, Public Hearing Transcript, October 6, 2005*)

The alternative that is not in here as well, the repair and replace alternative, it seems so natural and obvious you have a non-project alternative, you have the preferred alternative, and you have the repair and replace what's there alternative. (*David Cincotta, Public Hearing Transcript, October 6, 2005*)

I just sort of agree that one of the things you have to do with an environmental impact report is to explore the different alternatives and as been mentioned, alternative one is doing nothing, and one is the plan and I don't think enough attention is given to some of the alternatives which keep the present configuration of verse in place and merely do the dredging and of course seismically retrofit the seawalls. (*Commissioner Antonini, Public Hearing Transcript, October 6, 2005*)

The Repair and Replace Alternative

- Repair and make replacements as needed to the existing harbor facilities with the existing layout and the existing berth size distribution.
- Do the necessary dredging and sand mining.
- No new building construction or building additions.
- No additional West harbor breakwaters.
- Demolition of Degaussing Station and return of the site to Open Space.
- Seismically retrofit the Marina Boulevard and the Fair's Seawalls.

(*Anonymous, October 6, 2005*)

Let's not look back and say we made a big mistake and spent a lot of taxpayer dollars when we had the alternative of repair and replace. (*Gloria Fontanello, Public Hearing Transcript, January 12, 2006*)

[I would]...like you to require that staff evaluate what we are calling a repair and replace alternative. It's less environmentally - it's more environmentally sensitive, less environmentally damaging. I passed this out to you at the October 6th hearing. And it's perfectly reasonable, and I believe that CEQA demands that all reasonable alternatives be evaluated. (*Joan Girardot, Public Hearing Transcript, January 12, 2006*)

The rationale of the department for this whole tearing everything out and replacing it and driving this cost to 40 million is because they want to delete the berths for small boats, and they want to create the room for the large boats. And we like the existing berth size distribution and we like - it is not a question of like. We think that rec and parks mission is to make their facilities available to the broadest range of the public, and that means the guy who can only afford a 20 foot sailboat as well as the guy who can afford a 60 foot motorized yacht. And so we would ask you to require staff to include that [repair and replace] alternative in the Final EIR. (*Joan Girardot, Public Hearing Transcript, January 12, 2006*)

A reasonable alternative that should have been considered is to repair and replace the docks, slips, moorings and pilings without changing the configuration of the harbors, without building new breakwaters, and without erecting new buildings in waterfront park space. This alternative would achieve the sponsor's primary objective with much less environmental risk and at a much lower cost. (*Alan Silverman, Marina Community Association, January 18, 2006*)

Please evaluate the Repair and Replace Alternative, as suggested by the Marina Civic Improvement Association. (*Sue Chang, January 19, 2006*)

The Draft is substantially flawed in its Alternatives analysis because it does not examine a reasonable range of alternatives to the proposed Project. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Planning and Rec & Park Commissioners received numerous requests in support of inclusion of a Repair & Replace Alternative; a petition circulated in the Marina neighborhood, supports inclusion of a Repair & Replace Alternative; and three Planning Commissioners at the October 6, 2005 hearing opined that it is reasonable to include a Repair & Replace Alternative in the EIR.

A Repair & Replace Alternative would include the following elements:

- Repair and make replacements as needed to the existing harbor facilities with the existing layout and the existing berth size distribution.
- Do the necessary dredging and sand mining.
- No new building construction or building additions.
- No new additional West Harbor breakwaters; retention of West Harbor moles.
- Demolition of Degaussing Station and return of the site to open space.

A variation of the Repair & Replace Alternative would include the above elements and construction of the East Harbor breakwater and the permanent removal of berths in the Outer West Harbor (to provide a

Marine Sports Basin for kayaking, rowboating, sailing lessons, swimming, etc.) (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*) 335

Response 10.1

The comments requesting evaluation of a ‘repair and replace’ alternative in the Alternatives section of the DEIR are noted. DEIR Chapter VI, Alternatives, provided three project alternatives in addition to a No Project Alternative. The alternatives were Alternative A: *No Project*, Alternative B: *No New West Harbor Breakwaters*, Alternative C: *West Harbor Renovation Only*, and Alternative D: *Removal of the Former Degaussing Station and Expansion of the Harbor Office*.

CEQA Guidelines (Sec. 15126.6(a)) state, “An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.”

Nearly all of the components of the proposed ‘repair and replace’ alternative suggested by the commenters were evaluated within a reasonable range of alternatives provided in the DEIR. Project decision-makers could adopt any of the alternatives described in the DEIR, or a combination thereof, if determined feasible, instead of approving the proposed project.

For informational purposes, however, a brief evaluation of a “Repair and Replace Alternative,” as well as a “Repair and Replace Alternative + Berth Removal Variant,” are provided below, including most of the suggested components contained in the comments. These alternatives have also been prepared for comparative purposes with the proposed project, and include a description of whether these alternatives would feasibly accomplish most of the project sponsor’s objectives.

Seismic improvements to both seawalls (Fair’s Seawall and Marina Boulevard Seawall) were not included in the Repair and Replace Alternative. As no significant unavoidable impacts associated with the proposed project in connection with the seawalls were identified, this alternative component would not avoid or lessen any significant impacts associated with the proposed project, with the exception of reducing potential risks of reoccupancy of the Degaussing Station. Such improvements to the seawalls would not address functional issues for the marina or the existing areawide seismic risk. Seismic improvements to the seawalls would not avoid or reduce the liquefaction/lateral spreading risks associated with the Marina District, as the seawalls do not provide lateral stability for the entire area. Considering the large mass of unconsolidated fill behind and to the south of the seawalls that would continue to spread laterally in the event of a major earthquake, even seawalls that were seismically strengthened could be damaged in an earthquake unless most of the fill behind the seawalls was replaced and recompacted. Even the maximum practical effort in this regard would essentially render the Marina Green and Marina Boulevard unusable for the construction/soil recompaction period, which in turn, would have its own environmental impacts associated with traffic and recreational disruption, increased air emissions from fugitive dust, and visual concerns from soil stockpiling. Seismic improvements to the Fair’s Seawall, in particular, would have an adverse impact the historic significance of this structure, as the materials and features which define this structure’s significance as a WPA-era resources could

be eliminated. Furthermore, no amount of strengthening of the seawalls and the soil immediately south of them would address the existing risk of liquefaction to which a large part of the developed residential area of the Marina District is susceptible. As provided in the testimony at the DEIR public hearing on January 12, 2006, by a geotechnical expert, Frank Rollo, the marina box sewer running beneath Marina Boulevard provides the Marina District with some amount of protection from liquefaction in the event of a major earthquake.

CEQA requires the recirculation of the DEIR after the close of the public review period, prior to certification of the Final EIR, if “significant new information” is added to the Draft EIR. The CEQA Guidelines note, as an example of “significant new information,” a new project alternative, which is “...considerably different from others previously analyzed, that would clearly lessen the environmental impacts for the project that the project’s proponent decline to adopt.” A comparison of the “Repair and Replace Alternative,” and the “Repair and Replace Alternative + Berth Removal Variant,” with the Alternatives A - D presented on p. VI-1 through VI-9 of the DEIR, demonstrates that the impacts associated with these new alternatives *would be substantially similar* to the impacts associated with Alternatives A- D, particularly to Alternative A (No Project). For the reasons stated above, the inclusion of the “Repair and Replace Alternative,” as well as a “Repair and Replace Alternative + Berth Removal Variant,” does not meet the standard of “significant new information” as define by CEQA, and recirculation of the DEIR is not required.

The following components are included in the ‘Repair and Replace’ Alternative. The alternative(s) in which each component was evaluated in the DEIR is identified in parentheses.

- Repair and make replacements as needed to the existing harbor facilities with the existing layout and the existing berth size distribution, with modifications to provide accessibility as required by law. (Alternative A: No Project Alternative)
- Do the necessary dredging and sand mining. (Alternative A: No Project Alternative, and Alternative C: West Harbor Renovation Only)
- No new building construction or building additions. (Alternative A: No Project Alternative)
- No new additional West Harbor breakwaters; retention of West Harbor moles. (Alternative A: No Project Alternative, and Alternative B: No New West Harbor Breakwaters).

Repair and Replace Alternative

Description

The Repair and Replace Alternative would incorporate many of the suggestions provided during the public comment period, including as-needed repair and replacement of the existing harbor facilities while keeping them in the same size and configuration as existing conditions to the degree feasible when ADA requirements are implemented, continued dredging and sand mining (because of the existing Army Corps of Engineers permit, this would occur only in the West Harbor), no new building construction, no new breakwaters, and retention of the West Harbor moles.

Environmental Analysis

Similar to the No Project Alternative described in the DEIR (Alternative A, No Project Alternative, page VI-1), the “Repair and Replace Alternative” would result in no substantial changes to the project site, although the Department of Recreation and Park would undertake small-scale repairs at specific locations as needs become critical, but no large-scale renovations would occur. These repairs could trigger ADA requirements, which could ultimately require some reconfiguration or modification of facilities.

This alternative would avoid or reduce nearly all of the potentially significant impacts associated with the proposed project, including alterations to the potentially historic Harbor Office, and avoidance of public exposure to potential seismic risks associated with reoccupancy of the former Degaussing Station. Thus, no mitigation measures to reduce these effects would be required under the Repair and Replace Alternative. This alternative would also not result in any impacts related to wave action, vibration impacts to Pier 1 from pile driving associated with construction of the East Harbor floating breakwater, or potentially restricted access to Pier 1 resulting from construction of a new East Harbor breakwater that would occur under the proposed project.

Unlike the proposed project, this alternative would not result in disturbance of contaminated sediments in the East Harbor, and therefore this alternative would have no temporary construction-related effects on water quality. This alternative, unlike the proposed project, would not result in installation of an engineered cap of clean fill to isolate contaminated sediments from the water column following the completion of dredging. With no dredging in the East Harbor, this alternative would not expose people or the environment to elevated levels of polynuclear aromatic hydrocarbons. However, this alternative would also not result in long-term improvements to water quality in the East Harbor as compared to the proposed project. Similar to the proposed project, dredging and sand mining would continue in the West Harbor, which operate under an existing dredge permit.

As this alternative would not construct new breakwaters or provide reoriented slips and docks in the Outer West Harbor, this area would generally appear as it does under existing conditions (as shown in Figure 8A, p. III.B-11). However, the renovated slips and docks throughout the marina (both East and West Harbors), would continue to be unprotected from wind-driven waves from the north and northeast, and would therefore deteriorate at a rate similar to existing conditions, or deteriorate faster than they would under project conditions. Some changes in the docks could occur as ADA requirements are triggered by the repairs.

Retention of the north-south and east-west moles would maintain these existing project features in their current configuration and use. Compared with the proposed project, retention of the north-south mole, specifically, would avoid the potential for increased wave exposure to adversely affect the Fair’s Seawall in this location. This impact would also be avoided by Alternative B, No New West Harbor Breakwater.

This alternative would also reduce many of the operational and construction impacts described in the Initial Study, such as some construction-related traffic, noise, and air quality impacts; incremental changes (both increases and decreases) in operational emissions from vessels; effects

on fish, marine mammals, and aquatic habitat; and effects on archaeological resources. Unlike the proposed project, the Repair and Replace Alternative would not require mitigation for the following significant impacts identified in the Initial Study: generation of construction-period noise and vibration; construction air quality impacts; potential exposure to landside hazardous materials, including polychlorinated biphenyls (PCBs); and potential accidental discovery of archaeological artifacts. Unlike the proposed project, the Repair and Replace Alternative would not include Improvement Measure 1 from the Initial Study (“dry firing” during pile driving to alert marine mammals), nor would it include Improvement Measure HIST-1 (East Harbor Design Guidelines), as these would no longer apply. However, the project sponsor might still implement Improvement Measure 2 from the Initial Study (conduct public education activities to inform people of harbor rules and the importance of protecting water quality within the marina). This alternative would involve ongoing repair and replacement activities, which would generate their own construction-related noise, air quality, traffic, and other impacts; such impacts would be at a considerably lesser scale than those of the proposed project, but would likely occur over a longer (but unknown) period of time, as the conditions of the marina facilities warrant.

Compliance with Project Sponsor’s Objectives

The Repair and Replace Alternative would comply with some of the project sponsor’s objectives while not complying with others. This alternative would partially comply with, objective #1: provide a safer marina (because deteriorated slips and docks would be replaced as the need becomes critical); however, the useful life of the marina would be reduced compared with the proposed project, because the new slips would continue to be exposed to the damaging effects of wave action. This alternative would not comply with the following objectives - #2: protect marina structures from locally generated wind-waves from the north and northeast directions; #3: provide a slip-size distribution that more closely matches market demand; #4: expand and modernize the Harbor Office and relocate the Harbor Office to a site proximate to both the West and East Harbors; and #5: better serve marina tenants as well as the general public by providing new and improved facilities; new and upgraded toilet facilities and showers; new and repaired boat launch facilities at both harbors and a refurbished guest dock at the West Harbor; upgraded facilities for boat sewage pumpout; and enhanced landscaping.

According to the project sponsor, this alternative would not be a financially viable program without funding from DBW, and DBW would not likely fund such a project without permanent protection of new/replacement slips and docks by new breakwaters.⁹ Even if a loan from DBW could be secured without construction of protective breakwaters, this program may not be able to generate sufficient revenues to cover the costs of such a loan.¹⁰ As such, this program may not be financially

⁹ Email from Harold Flood, Department of Boating and Waterways, to Mary Hobson, San Francisco Recreation and Parks Department, February 14, 2006. Re: MYH – DEIR Comment Responses. In the email, Mr. Flood states, “DBW staff and a DBW commissioner saw the wave action, and need to stagger vessel orientation in the slips, caused by a single ferry pass on a recent visit. DBW understands that the breakwater improvements are necessary to cut the wave action caused by storms and large passing vessels to allow full occupancy of the outer slips as well as save on maintenance costs.” This email is on file with the San Francisco Planning Department, 1660 Mission Street, San Francisco, CA. File No. 2002.1129E.

¹⁰ *ibid.* “...changing the slip configuration for SF’s Project now will result in the need for a new feasibility report and possibly new Commission approval. DBW compares slip size to occupancy levels at, and near, the site when preparing a feasibility

feasible. Finally, this alternative would create an obsolete facility, as slip size width would be less able to accommodate newer vessels.

Repair and Replace Alternative + Berth Removal Variant

Description

The Repair and Replace Alternative + Berth Removal Variant would include all of the suggested components described under the Repair and Replace Alternative, with the inclusion of permanent removal of all berths in the Outer West Harbor (a total of approximately 72 existing berths).

Environmental Analysis

The impacts of the Repair and Replace Alternative + Berth Removal Variant would be substantially similar to those described above under the Repair and Replace Alternative. However, this alternative variant would also permanently eliminate approximately 72 slips which currently exist in the Outer West Harbor, including all of the berths used by the Golden Gate Yacht Club. Operationally, this variant would likely put the Golden Gate Yacht Club out of business. In terms of environmental effects, slips and boats would no longer be visible along the water's edge north of the Marina Green (see Figure 7A, p. III.B-10, but without views of the existing slips and boats shown clustered to the left of the view). This would change the visual setting by providing greater public views of open water in the Outer West Harbor, as well as enhance views of the Bay to the north of the jetty. While views of the Bay are accessible under existing conditions, they are seen through the masts of existing sailboats in the Outer West Harbor, which would be eliminated under this variant. However, elimination of these slips would not reduce or avoid a potentially significant visual impact associated with the proposed project, as none were identified in the DEIR. There would be some temporary construction impacts associated with the removal of these slips and docks, but they would not be considered significant.

Creation of a marine sports basin in Outer West Harbor, potentially for kayaking, row boating, sailing lessons, and swimming, as suggested by some of the commenters, would conflict with the ongoing marina operations of the West Harbor, as this area is used by boats entering and leaving the mouth of the harbor. Such a conflict could create a safety hazard whereby larger boats could conflict with smaller boats, kayaks, and/or swimmers.

Compliance with Project Sponsor's Objectives

Similar to the Repair and Replace Alternative, this variant would comply with some of the project sponsor's objectives while not complying with others. This alternative would partially comply with objective #1: provide a safer marina (because deteriorated slips and docks would be replaced as the need became critical); however, the useful life of the marina may be reduced compared with the proposed project, because the new slips would continue to be exposed to the damaging effects of wave action. This variant would, however, potentially conflict with the safety goals of objective #1

report to verify projected revenues. Lowering projected revenues (repayment possibilities) could change the funding level. I only mention this because it could mean a significant delay and higher costs for the Project.”

due to increased conflicts if the suggested marine sports basin in the Outer West Harbor were included. This variant would not comply with the following objectives - #2: protect marina structures from locally generated wind-waves from the north and northeast directions; #3: provide a slip-size distribution that more closely matches market demand; #4: expand and modernize the Harbor Office and relocate the Harbor Office to a site proximate to both the West and East Harbors; and #5: better serve marina tenants as well as the general public by providing new and improved facilities; new and upgraded toilet facilities and showers; new and repaired boat launch facilities at both harbors and a refurbished guest dock at the West Harbor; upgraded facilities for boat sewage pumpout; and enhanced landscaping.

Similar to the Repair and Replace Alternative, this variant would also not be a viable program without funding from DBW, and DBW would likely not fund such a project without permanent protection of new/replacement slips and docks by new breakwaters. Even if a loan from DBW could be secured, this program generate sufficient revenues to cover the costs of such a loan. With a further reduction in approximately 72 slips in the Outer West Harbor, this variant may even be less financially feasible than the Repair and Replace Alternative. Elimination of slips in this area would also not be operationally feasible for the Golden Gate Yacht Club, which keeps many if not all of its boats in this area.

COMMENT 10.2

[The] EIR determines the overall visitation is not expected to be substantial, which seems contradictory to the projects need for additional toilets and showers and it supports a revised alternative. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

Response 10.2

The proposed project includes improvements to the restrooms for ADA compliance purposes, as well as additional boater-only showers to improve water quality in the harbors, but not accommodation of an anticipated increase in visitation at the marina due to the proposed project. As no impacts from these restroom improvements are anticipated, a revised alternative to avoid or reduce such impacts would not be required. Alternative A, No Project Alternative, in Section IV of the DEIR, would include no new showers or toilets in the marina. Selection of the No Project Alternative would not avoid or reduce any significant impacts associated with these project components, as none were identified in the DEIR.

As described in the DEIR Project Description (page II-13 – 14), the primary objective in upgrades to toilet and shower facilities is not to accommodate increased activity. Rather, “The East Harbor restrooms would be expanded and/or renovated for ADA compliance. They are intended for the use of boaters only, similar to the West Harbor restrooms and showers. By providing bathroom and shower facilities, the marina would be able to accommodate guest boaters in the East Harbor (guest boaters are currently accommodated in the West Harbor only). Guest and permanent boaters would then be more inclined to use landside showers and toilets, and less inclined to use their on-board toilets and showers, which would reduce accidental spills and/or overflows from the holding tanks

of vessels. These measures would improve water quality in the East Harbor. Public restrooms would be open during park hours (6 a.m. to 10 p.m.), as they are currently. Boaters-only restrooms could be accessed with a key at any time, as they are currently.”

Selection of the “Repair and Replace Alternative” described in Response #10.1, would include no new landside construction, presumably including no improvements to the restrooms in the East and West Harbors. Again, as no impacts associated with these project components were identified under the proposed project, selection of the Repair and Replace Alternative would not avoid or lessen any significant impacts.

COMMENT 10.3

.....even in Alternative D if you were not to build for instance move the Harbor Master’s office to the Degaussing Station. I am troubled by the fact that it gives the recommendation to tear it down. It’s good enough to keep it unless you don’t let us move in there and then it has to go. Doesn’t sound like a sound recommendation as part of these alternatives and it does have some level of significant –historic significance so therefore it should be looked at as something that would be saved. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

Relocation of the Degaussing Station from its present site to an alternative one would be a view improvement for all and its use as a Harbor Office seems a needless expansion of facilities. (*Nathaniel Berkowitz, October 18, 2005*) 139

The harbormaster’s office should stay where it is – overlooking the west harbor. If expansion is needed, the expansion should take place at the location of the existing office. (*Bruce Munro, January 16, 2006*)

Response 10.3

Alternative D: Removal of the Former Degaussing Station and Expansion of the Harbor Office (DEIR page IV-7) was included in the DEIR for two reasons: to avoid the potentially significant impact of increased seismic risk exposure from reoccupancy of this building for use as a Harbor Office, and to recognize the number of public comments received as part of the EIR process about the desire to remove this building for visual and aesthetic reasons. While no significant adverse visual or aesthetic impacts associated with the conversion of this building to a Harbor Office were identified in the DEIR, the removal of this building and a return of the area to open space would have the beneficial effect of providing greater views of the Bay in this immediate area.

Alternative D also evaluates the potential effects of expanding the existing Harbor Office in its current location. As stated on page VI-8, “Depending on the ultimate design of the Harbor Office expansion, this alternative could result in a significant impact to the building’s status as a potentially eligible historic resource, as described in Section III.C, Historic Resources. Mitigation Measure HIST-2, requiring compliance with the *Secretary of the Interior’s Standards for Rehabilitating Historic Buildings* for any expansions and renovations to this building, would reduce this impact to a less-than-significant level. The former Degaussing Station was not found to be eligible as a historic resource under CEQA, and therefore its demolition would not result in a

significant impact to historic resources.” Using the former Degaussing Station as a site for the Harbormaster’s office would allow the West Harbor restroom facilities to be upgraded without requiring expansion of the building, thus avoiding a potential significant impact on an historic resource.

An EIR does not recommend one alternative over another; rather, it provides decision-makers (such as the Planning Commission or the Recreation and Park Commission) with the information required when certifying the Final EIR and/or approving the proposed project.

COMMENT 10.4

The Draft EIR does not consider the alternative of not building the proposed maintenance building. No other aspect of the project is dependent on the proposed maintenance building. Indeed, the Draft EIR concedes that a larger space at the SFPUC Pump Station at the West Harbor currently serves the same purpose and will become vacant if the proposed building is built. If for some reason that has not been articulated in the Draft EIR, the proposed building is necessary, it could be located north of the public restrooms at the West Harbor near the SFPUC Pump Station. See Figure 3 at II-7. That location abuts an existing driveway and would not block any views nor interfere with recreational use of the surrounding space. This alternative should also be considered. (*Michael Spiegel, September 27, 2005*)

The Draft EIR does not consider the alternatives of not building the proposed maintenance building nor of locating it elsewhere. (*Michael Spiegel, September 27, 2005*)

I want it raise a point that the Draft EIR as to this thousand foot maintenance building doesn’t consider any alternative. It is my understanding that an EIR is supposed to consider alternatives. The major alternative not considered is that this thing can be located somewhere else other than right there in the middle of this east marina green. That’s open space. (*Michael Spiegel, Public Hearing Transcript, January 12, 2006*)

Response 10.4

Alternative A: No Project Alternative, in Section IV of the DEIR, would include no new construction, such as the proposed maintenance building in the East Harbor open space area. Under this alternative, the Department of Recreation and Park would continue to use the SFPUC building in the West Harbor for maintenance purposes. Selection of the No Project Alternative would not avoid or reduce any significant impacts associated with this project component, as none were identified in the DEIR.

As described in the Project Description (DEIR page II-13), “The Department of Recreation and Park would construct a new maintenance facility to replace the current maintenance facility, which is in a structure owned by the SFPUC, which has expressed the desire to close this facility. The new maintenance building would be located at the East Harbor to be more centrally located, and for its adjacency with other structures in the area (the East Harbor restrooms).”

It is noted that eliminating the proposed maintenance building – a relatively minor project component – from the proposed project would neither eliminate significant effects of the project, nor result in new significant impacts, and thus the decision-makers could approve a variant of the project with no new maintenance building or with the maintenance building located closer to the parking area, based upon the analysis in this EIR. Please also see Response #10.1 regarding the “Repair and Replace” Alternative.

COMMENT 10.5

The DEIR ignores the mandate of Sec.15126.6(a) which requires that the “lead agency...must publicly disclose its reasoning for selecting those alternatives.” The DEIR contains no such reasoning and is therefore incomplete. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

The DEIR does not address other alternatives that may have been considered but ultimately dismissed from further study in the EIR. Such a discussion should have included the reasons for not including them in the EIR. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

...the Marina alternatives were crafted behind closed doors and no member of the public knows why they were chosen. Please consider this our request that in the Comments & Responses document the Project Sponsor/Lead Agency disclose its reasoning for selecting each of the “action” alternatives: (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 10.5

Alternatives A-D in the DEIR were prepared by Planning staff and its EIR consultants to avoid or lessen significant effects of the proposed project while still attaining most of the basic project objectives, as required by CEQA. The alternatives were also crafted to respond directly to many of the concerns and comments received during the public scoping process. This is the rationale for the selection of the alternatives discussed in the DEIR.

The Alternatives Section of the DEIR (Section VI, Alternatives to the Proposed Project) identifies four alternatives to the proposed project and discusses environmental impacts associated with each alternative, as well as the project-related impacts that would be avoided, reduced, or remain the same if the alternative were adopted. Each alternative is also compared to the project sponsor’s objectives described in Chapter II, Project Description. Project decision-makers could adopt any of these alternatives, if feasible, instead of approving the proposed project.

The project sponsor’s rationale for the inclusion, or in some cases the exclusion, of various project components is described in the Project Description section of the DEIR (see page II-13).

11. COMMENTS ADDRESSING THE INITIAL STUDY

General Comments

COMMENT 11.1

The analysis in the IS is insufficient and the conclusions arbitrary, and we therefore ask that you again evaluate the issues you have decided to drop. Your conclusions are not supported by the substantial evidence in the record, and in some instances are actually based on false information, presumably given to you by the project sponsor. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

Response 11.1

The environmental topics included in the Initial Study were evaluated in sufficient detail to allow for a reasonable conclusion that the project would have no significant impact, or a less-than-significant impact, on factors of the environment evaluated in that document. The Initial Study helps to focus the EIR on those topics where significant impacts may occur, and for which mitigation measures may be required.

Visual Quality

COMMENT 11.2

To assert that introduction of exterior lighting at the degaussing station will have no effect, when there is at the present time no exterior lighting, and that an office use will have no impact on the existing character of the vicinity is ludicrous. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

Please evaluate the effects of the lighting of the building [Degaussing Station] at night on an existing dark shoreline. Though the Harbor Office may not be open to the public, there is currently a night watchman on staff until midnight. (*Sue Chang, January 19, 2006*)

Response 11.2

Project sources of light and glare are addressed on pages 18-19 of the Initial Study. The Initial Study acknowledges that lighting levels would increase as a result of the reoccupancy of the Degaussing Station, but that it would not result in a significant lighting or glare impact. As stated in the Initial Study, "All interior lighting associated with the renovated Degaussing Station would shut off automatically after midnight when office staff would leave the facility or whenever the office is left vacant. Interior lighting sources could be minimized through the use of curtains or blinds. Exterior lighting, however, would remain on all night for security purposes. Although this would reintroduce a lighting source in an area that is currently dark at night, all lighting would be fully shielded and all illumination directed downward to prevent glare and light trespass, as discussed above. As a result, new lighting associated with the project would not generate obtrusive light or glare substantially impacting other properties."

COMMENT 11.3

What studies could be done that would show where blocking of sunlight would occur from placement of three story or larger motor vessels and whether it would cause smaller vessels to be damp, cold or creating diminished values or damage to said same. (*Will LeRoy, undated*)

Response 11.3

As noted on page 34 of the Initial Study, Planning Code Section 295 (Proposition K) prohibits new shadows from buildings encroaching upon the Department of Recreation and Park properties, and that buildings less than 40 feet in height and/or constructed on Department of Recreation and Park property for recreational and park-related uses are exempt from Proposition K. Proposition K makes no provisions for shadows created by boats, as they are moveable, and therefore considered a temporary addition to the landscape. There is no reason to expect that vessels of the size that could be accommodated after marina renovation would substantially alter conditions for the other boats with regard to light and shadow. If there were to be such an effect, it would be an operational consideration for marina users and operators, and not a potential significant impact.

Noise

COMMENT 11.4

.... this area [East Harbor] is also adjacent to the [Fort Mason] conference center and gate house which is rented out often to the community. So that's a concern that events and meetings are not interrupted. The pile driving and the noise levels associated with that. (*Suzanne Lifson, Public Hearing Transcript, October 6, 2005*)

Sound Pollution. While the boats in the marina currently cause something in the order of sound pollution it is no where near that of the race boats. There are no restrictions on these in the area of annoyance except what an officer will take on by the seat of his pants. Noise meters are very rare and without one only opinion guides the court on how loud it was. (*Will LeRoy, undated*)

Response 11.4

Operational and construction noise resulting from the proposed project is addressed on pages 28 – 30 of the Initial Study (DEIR Appendix A). Noise associated with the renovated boat hoist, as well as from additional traffic in the trailered boat parking area, is addressed on DEIR page V-5. Mitigation Measure 1 on page 71 of the Initial Study describes the available measures to reduce noise impacts from pile driving during construction of the proposed East Harbor breakwater, with a further refinement of this measure on page V-5 of the DEIR. As noted in both the DEIR and Initial Study, noise impacts from the proposed project are not anticipated to be significant (with the exception of construction-related pile driving for the proposed East Harbor breakwater).

COMMENT 11.5

Please evaluate the construction-related noise as it would affect school children and permitted sports on the Marina Green. (*Sue Chang, January 19, 2006*)

Response 11.5

See Response #11.3, above. The noise analyses provided in both the DEIR and the Initial Study evaluate potential noise impacts of the proposed project on all sensitive receptors in the area, including recreational users and children.

Air Quality

COMMENT 11.6

And for a minute, think about what you're doing when you're replacing these small twenty foot boat with big 44 foot power boats, three story Bayliners with twin V8 engines and to keep them running they've got to run them engines once a week to keep the engines maintained. You're going to run two engines on each boat times two hundred boats, four hundred Diesel engines V8 are going to pollute the Bay. And it's not going to have an environmental impact? (*Rene Monchatre, Public Hearing Transcript, October 6, 2005*)

Response 11.6

Adverse effects on air quality resulting from project operations were determined by comparing emissions of the proposed project to existing emissions. The emissions were calculated based on emission factors provided by the California Air Resources Board's *Pleasure Craft Emission Inventory Recommendation* (CARB, 1998). The analysis considered factors such as 1) engine types, 2) associated horsepower, 3) number of marine engines operating at the project site per day, and 4) hours of daily operation. The analysis assumes approximately the same proportion of power boats to sailboats as the current marina tenants. The total pounds per day (lbs/day) emission estimates were compared to the BAAQMD's thresholds for determining if a project would have a significant impact on air quality. The BAAQMD considers a project to have an adverse impact on air quality if proposed operations result in emissions greater than 80 lbs/day of ROG, NOx, PM10, or PM10 precursors, such as SOx. As provided in Table 4 of the Initial Study Air Quality section, the project emissions would be well under the BAAQMD's significant thresholds of 80 lbs/day of NOx, and as a result, the project's air quality impacts are considered less than significant. Emissions of ROG and PM10, specifically, would decrease due to use of diesel fuel in larger marine engines as compared to the typical use of gasoline in the smaller marine motorized vessels. Diesel fuel is considered to result in less ROG and PM10 emissions per load factor for some engine types. For example, the associated ROG emission factor for motor boats less than 25 feet is 117 grams per horsepower hour (g/hp/hr) as compared to the emission factor associated with motor boats greater than 40 feet, which is 2.6 g/hp/hr. As the proposed project may result in a decrease in the number of smaller boats operating at the marina over the long-term, fewer gasoline engines would be operating and thus the project would result in a decrease in ROG and PM10 emissions.

COMMENT 11.7

What proof is there that smaller craft (20 to 25 foot) use 2 stroke motors when these craft rarely if ever use motors at all? (*Will LeRoy, undated*)

Response 11.7

Page 32 of the Initial Study describes marine vessel emissions by size and type, including the typical use of two-stroke, gas-powered auxiliary engines on smaller sailboats and fishing boats. The air quality analysis included a survey of marine vessels registered at the marina and associated engine types. In addition, marina officials were contacted and interviewed to assist with the inventory of existing boats, inventory of proposed boats, and associated operating conditions. Available information indicated that the smaller craft (20 to 25 foot sailboats) typically have small, two-stroke gasoline engines that are used primarily when entering and exiting a harbor. Information was summarized for the 20 to 25 foot craft and profiles generated for daily engine usage. Impacts to air quality are determined on a daily basis for the BAAQMD, and the analysis considered these boats to operate approximately one hour each day (or 30 minutes entering and 30 minutes exiting harbor). Other than the one hour per day of motor use, these boats were considered to be sailing and not operating their engines.

COMMENT 11.8

This plan on page 33 uses a table with the term ‘assumed’ referring to a model supplied to the Bay Area Air Quality Control Management District. Does that make it fact? Please show more detail how air quality proposed will be made better by boats of many times the current displacement. (*Will LeRoy, undated*)

Response 11.8

Table 3 on Page 33 of the Air Quality section of the Initial Study summarizes marine engine usage for each boat type under existing and proposed project conditions. The usage factor that is shown as “assumed” is related to how often the boats operate on a daily basis (see Response #11.7, above, for more detailed information related to how daily usage was obtained). The values shown in Table 33 as “assumed” are not from a BAAQMD model, nor does the Table or associated text indicate the application of a BAAQMD model to obtain the usage values. Actual operating data for each marine engine was based on information supplied by the harbor master. See Appendix A of the Initial Study for more detailed information regarding the usage factors applied for each boat type.

COMMENT 11.9

Let me point out first that none of the motor boats proposed make use of or are planning to make use of smog devices. The pollution associated with the proposed replacement of small sail boats with ship type super yachts will not clean the air as has been implied or stated in this draft EIR. Since terms such as ‘assumed’ (“Table 3 page 33 “Marine Operation Conditions” far right) are used there is little point in using supplied facts on increased emissions. Existing’ The idea that 164 vessels under 40 feet make an

assumed 4.9 trips on peak days is based in lunacy but then reiterated by BAAQCMD to pretend it is fact. (*Will LeRoy, undated*)

Response 11.9

The air quality evaluation in the Initial Study did not evaluate the use of smog devices or associated filter equipment during the analysis, as currently such devices are the responsibility of the engine manufacturer and not private owners. For example, CARB implemented marine engine standards for inboard and sterndrive engines on June 8, 2001, and is currently considering amending these regulations (referred to as Resolution 05-57 [November 17, 2005]). The goal is to effectively implement exhaust standards for spark-ignition recreational marine engine manufacturers, which includes inboard and sterndrive pleasure craft being used primarily for recreational purposes. CARB estimates that the statewide summer weekend emissions inventories of NO_x and Hydrogen Compounds (such as ROG and VOC) will be reduced by 44.8 tons per day and 12.0 tons per day, respectively, in 2020 as a result of the Board's action. Estimated boat trips per day (maximum of 20 trips per day on a summer weekend) were based on existing operating logs maintained by the harbor master and his personal knowledge of the area, and not by any information provided by BAAQMD.

COMMENT 11.10

Let me point out that the carbon monoxide related to these and all engines cause death to swimmers and boaters alike, every year! So many deaths in fact. The governor this year signed into law a bill banning devices towed from the stern because so many had died from inhaling the deadly gas. Larger boats constitute an increase in carbon monoxide emissions that cannot be measured. (*Will LeRoy, undated*)

Response 11.10

The commenter is referring to Assembly Bill 2222, also known as the Koretz Bill, which is intended to make boaters aware of the risk of carbon monoxide emissions behind boats. The law specifically informs boaters of the risks that result from what is termed "teak surfing", in which a person is swimming near the back of a motorized boat, or where the exhaust is located. The bill was developed due to the new trend of teak surfing, or body surfing, where individuals hold on to the swim platform while the boat moves forward, and then attempt to body surf the boat's wake. This recreational boating practice is not common for San Francisco Bay marine activities. Even so, the law does not disallow such activities. Instead, boaters are required to post signs next to the exhaust to inform fellow boaters or swimmers to avoid the area when the boat is operating. AB 2222 requires the state Department of Boating and Waterways and the Department of Motor Vehicles to provide this information to boaters in their boat registration renewal. The bill also requires that when any boat is sold in California, new or used, that warning stickers be affixed to the boat. AB 2222 was promulgated on May 1, 2005. The AB 2222 signage requirements would apply to the new boats at the marina, and the distribution of such information would be administered as required by the new law.

Regarding CO emissions specific to the proposed project, as shown on Page 20 of BAAQMD's guidelines, CO impacts from new projects are evaluated based on additional automobile trips resulting from a proposed project. Specifically, the District generally does not recommend a detailed CO analysis for projects generating less than 2,000 vehicle trips per day, unless warranted by the specific nature of the project or project setting (page 24). As shown in the Traffic Section of the Initial Study, the proposed project would not result in increased automobile traffic.

For analysis of CO impacts from marine activities, CARB's marine engine emission factor for CO, provided in CARB's *Pleasure Craft Emission Inventory Recommendation* (1998), provides a numerical value (or emission factor) for CO associated with marine engines. The emission factor for smaller motor boats (less than 25 feet) is much higher as compared with the factor associated with the larger marine vessels. The CO emission factor for the smaller boats is 208 g/hp/hr and the emission factor associated with larger motor boats (greater than 40 feet) is significantly lower (4.7 g/hp/hr). This differential is related to the typical use of gasoline for smaller boat engines, which result in higher CO emissions per gram, as compared to diesel fuel. As the proposed project may result in a decrease in smaller boats operating at the marina in the long run, fewer gasoline engines would be operating and thus the project would result in lower CO emissions.

COMMENT 11.11

The P.M.10s and other pollutant gases from these engines is most likely to spill out over Marina Boulevard driven by the prevailing breezes moving South to South-East most mornings. This will be most intense on Saturdays, Sundays and holidays when park users and boat users will be at peak usage. At times when joggers will be most present and just down wind on the edge of the marina. Events such as bike rides and the city's Bay to Breakers will certainly feel. There can be no doubt this plan will diminishing the air and quality of life in the area then it isn't to say it won't see joggers day, every day. It will. (*Will LeRoy, undated*)

There is also the 'Particulate Matter.' Under ten microns they are refered [sic] to as PM10s. PM5s or PM2.5s. These are so small they lodge to deep in your lungs to be expelled. Motors constitute the single highest risk to peoples health as related air pollution Please look at table of boats proposed on page II-9 and see what will replace our the smallest twenty footers who sail in and out without motors. Without even serious math you can see the large to extremely large boats dominate the picture in four of the five plans in this EIR. (*Will LeRoy, undated*)

Response 11.11

The usage characteristics for each boat category were provided by the harbor master based on existent operating logs. In addition, if the usage factors were doubled, for example, the proposed project would still be under the BAAQMD thresholds of significance for determining potential impacts to air quality. As described in Response #11.6 above, the proposed project would have an overall reduction in PM 10 when compared to existing conditions.

The air quality analysis prepared for the proposed project evaluated PM 10 emissions. PM 5 and PM 2.5 are components of PM 10. Therefore, as the proposed project would not increase PM 10 emissions beyond BAAQMD thresholds, it would also not increase PM 5 and PM 2.5 emissions.

Biological Resources

COMMENT 11.12

The EIR states that a total of 705 creosote-treated piles would be removed and replaced 750 concrete piles. While the Commission encourages the replacement creosote-treated piles, the sheer number of piles that would be replaced raises issues regarding pile driving and its impacts on fish and other aquatic species. The EIR should evaluate the potential impacts of pile-driving, the sound pressure levels that would be generated and propose mitigation measures that would reduce potential impacts associated with pile driving (e.g., bubble curtain). In addition, the EIR should include mitigation restricting all in-Bay construction activities to discrete times of the year that would avoid impacts to special-status fish species and managed fisheries. (*Michelle Burt Levenson, BCDC, October 20, 2005*)

Response 11.12

Page 41 of the Initial Study addresses creosote-treated pile removal as well as pile driving activities on aquatic species. As noted in the Initial Study, “The project would involve placement of 750 concrete pilings within the marina. If salmonid species are present in the project area, increased sound pressure levels during pile-driving activities could result in significant impacts to such species. Rutten (2003) identified several salmonid species, including coho salmon, Chinook salmon, and steelhead, as potentially present in the project area between the period of November 1 to June 1. Outside of this period, salmonids are not expected to be present in the project vicinity. Based on input from NOAA Fisheries (Rutten, 2003), avoiding pile-driving activities between November 1 and June 1 would avoid potential impacts to salmonids (refer to Table 6 for potential work windows for pile driving). Because the proposed project would not involve pile driving from November 1 to June 1 (or as otherwise stipulated by NOAA Fisheries and USFWS), the impacts of such activities on fisheries would be less than significant.”

The use of a bubble curtain to reduce the sound pressures generated by pile driving was not included in the DEIR as a mitigation measure, as no significant impact to biological resources resulting from pile driving were identified (because such activities would occur within the proposed work window). Although this timing of pile driving is not proposed as part of the project, impacts to biological resources from pile driving activities that occur outside of the identified work window can be effectively reduced through the use of a bubble curtain. If pile driving activities were to occur outside of the identified work windows, a bubble curtain could be used to reduce impacts to biological resources.

Water Quality

COMMENT 11.13

The water pollution associated with boats is well documented. Voluntary or not all boats expel unwanted contaminants in the water. It is a necessary evil with marinas and the more or bigger the boats the more pollution. Many strides have been made but there is no way to completely stop it. Most of it is unintentional and the sinking of a larger boat has greater potential for hundreds of gallons of fuel to be released. The fines are substantial but it is also in most cases unavoidable. Almost all boats that use engines have water pumped through the engine before exiting through a water cooled exhaust system which is pumped overboard. The washing of decks and polishing of fiberglass sends pollutants into the harbor as well. The large white plastic house boats will of course do this and no matter the intentions of the owner [may] send many gallons of it overboard.

Another overlooked source of water contaminants is poisonous paint sold for bottoms of vessels to fend off slime and growths of every description. While these paints are of milder extraction than the old red leads or arsenic paints of the past, many copper based paints today pollute the water. New paints such as ablatives break off as organisms attach themselves exposing new layers of poison. This is due to their chalky nature.

Ablatives are least expensive but all paints are a source of contaminants and once again bigger the boat, the more to deal with. The pumping out of boats is also a large source of contamination. All boats get water in them whether from above or below and all boats must pump out but engines must be washed and bilges flushed out. The more in size the more capacity for damage to water quality. Pumping sewage may also be a problem. (*Will LeRoy, undated*)

Response 11.13

Marinas are recognized as a source of nonpoint source pollution to marine waters. As discussed on page 52 of the Initial Study, the marina would be required to comply with water quality management measures for the protection of water quality during operation of the marina. The management measures that could apply include solid waste control, liquid material control, petroleum control, boat cleaning and maintenance, and maintenance of sewage facilities. Because compliance with these measures would be incorporated as special permit requirements of the Major Permit, issued and enforced by the BCDC as discussed on page 52 of the Initial Study, water quality impacts related to marina operations would be less than significant.

In addition, the project sponsor would implement Improvement Measure 2 of the Initial Study. This measure would educate marina tenants about the potential water quality impacts related to the use of cleaners, solvents, and paints for boat cleaning and maintenance; encourage tenants to restrict the use of these materials, educate tenants about more environmentally sound alternatives to the use of these materials, and encourage tenants to minimize underwater hull cleaning and maintenance. Implementation of this improvement measure would provide additional water quality protection from potential impacts associated with boat activities in the marina.

COMMENT 11.14

Tidal Surges. Many people don't realize what happens in the instance of a tidal surge. They are not as uncommon as you would think. Many boats know they can best survive this kind of disaster by making it to out to open water and simply riding over it. The worst case scenario is when boats are unable to because of size or congestion to do so. We have all seen the pictures of towns buried in a tangle of boats and docks.

How this happens in the posts or piling or a dock are only so tall; when the tide comes in or ebbs the dock rides up and down on these keeping boats and dock anchored to pilings. When a tidal wave or massive surge comes it cause the dock to ride above the pilings un-anchoring docks and allowing boats to wash ashore. Large boats weigh more and this means they push harder against pilings. Piling must be longer to reach the depth they sit at. This gives more leverage and weight to topple pilings and the proposed plan would more than double the weight of existing boats.

People are not killed by the water so often as objects in the water driven at them, such as boats and debris. The bigger the network of docks, plus the larger boats represent greater potential for property damage and loss of life. The large boats proposed in this plan could weigh in at tens of tons and when unleashed into a neighbor hood would look like the proverbial bull in a china shop.

Again, lighter craft are not only likely to survive and do less damage but offer a source of rescue. Certainly they dislodged, float or can be carried off far more readily.

The only affordable way I know to mitigate for this is to have a reduced number and size of boat in the harbor. (*Will LeRoy, undated*)

Response 11.14

Tidal surge, in the form of tsunamis, is addressed on page 46 of the Initial Study. As noted on this page, "although people would be evacuated in the event of a tsunami, there could be property damage due to inundation and swamping of small vessels. However, tsunamis are extremely rare and there would not be a substantial change from existing conditions with regard to marina facilities and number of boats docked at the harbors. Therefore, potential impacts related to damage to structures and boats would also be less than significant."

COMMENT 11.15

Oily Water Separators: What are the exact location and dimensions of each? What is the exact location of the holding tank under the Marina Green? Please provide a photo or rendering. What measures for the prevention and detection of leaks and spills will be established? What mitigations are proposed? What is the clean-up action plan for leaks and spills? Does this industrial use detract from the quality and character of the Marina Green? (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 11.15

As addressed on page 51 of the Initial Study, the project would provide three oily water pumpout facilities; one new facility in the West Harbor and two refurbished facilities (one in the West Harbor and one in the East Harbor). The planned location of these facilities is shown on Figure 3 of the Initial Study and Figure 3 of the DEIR. They would be provided in compliance with the Bay Conservation and Development Commission (BCDC) management measures for the protection of water quality, and they would encourage proper handling of oily water by marina users. Specific measures for maintenance of these facilities (including prevention and detection of leaks and spills and cleanup) would be provided by the marina operator and subject to review and approval by the BCDC. Compliance with these measures would be incorporated as a special permit requirement of the Major Permit issued and enforced by the BCDC. No holding tank is planned at Marina Green.

Provision of new or refurbished pump out facilities would be consistent with the continued use of the project area as a marina. The additional pump out facility would be located on the end of the proposed new dock at the West Harbor, about 800 feet west from the Marina Green (see Figure 3 on page II-7, item #1). Given the distance between this relatively small pump and the Marina Green, it would not substantially detract from the quality and character of the Marina Green.

Energy/Natural Resources***COMMENT 11.16***

The project proposes 623 berths. 623 times 30 amps is a huge increase in the consumption and in the current energy used. (*Emeric Kalman, Public Hearing Transcript, October 6, 2005*)

Please quantify maximum energy consumption in the final EIR. (*Emeric Kalman, Public Hearing Transcript, October 6, 2005*)

An analysis of increased consumption of electricity is omitted. Providing 30 amps to 628 berths (each) is a huge increase over present consumption. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 1005*)

How many amps of electricity will go to each 30 ft berth? each 35 ft berth? 40 ft berth? 45 ft berth? 50 ft berth? 60 ft berth? 70 ft berth? 80 ft berth? 90 ft berth? What is the total amount needed for the harbor renovation? What is the existing amount of amperage available? Please verify that the harbor currently has all the power that is necessary and that no additional power will need to be brought to the site because of this plan. (*Sue Chang, January 19, 2006*)

The Project proposes to “upgrade electrical service to minimum capacity of 30 amps per berth.” Please state the maximum capacity per berth that might be provided by this Project. Please quantify total increased energy consumption over current conditions that might be expected. Please factor in the 24 hr/7 days a week use of dehumidifiers which is a common practice of large yachts in port. Please also factor in the potential for live-aboards. (*Joan Marie Girardot, Marina Civic Improvement & Property Owners Association, January 19, 2006*)

Response 11.16

The majority of the berths have hook ups with 15-20 amp receptacles. The proposed project would increase the amperage to 30 amps per berth, for an average increase of 10-15 amps above existing conditions. The anticipated increase in electrical consumption resulting from the proposed project is provided on page 55 of the Initial Study, and described in greater detail on DEIR page V-6, Utilities. As noted in the DEIR, "... utilities and public services are already provided in the project area. The proposed project would include upgraded electrical and water services to the new floating docks, which would incrementally increase demand for and use of public services and utilities on the site. Although increased electrical usage could occur at the marina under project conditions (given that somewhat larger boats could be accommodated at the marina, and larger boats generally consume larger amounts of electricity), the increased electrical usage is not expected to be substantial. In addition, the project site is currently served by an electrical system with sufficient capacity to provide for marginally increased usage at the marina without the need to construct new utilities either on or off the site, and electrical increases would not greatly exceed anticipated levels of service in the area. Thus, the proposed project is not expected to have a measurable impact on public services or utilities, and no further discussion of this issue is required in the EIR."

Hazardous Materials

COMMENT 11.17

The IS does not evaluate the alternative of putting concrete or stainless steel "sleeves" on the pilings which are salvageable instead of removing them and replacing with new pilings, which have serious environmental effects because of the PAH's. (*Joan Girardot, Marina Civic Improvement & Property Owner Association, April 22, 2005*)

Response 11.17

The commenter's suggestion to install stainless steel sleeves on salvageable pilings is noted. As discussed on pages II.5 and II.6 of the DEIR, the project would remove about 705 creosote-treated piles and install about 750 new concrete piles, which would help to improve water quality at the marina. Potential exposure to PAHs is described in Section III.E of the DEIR as it relates to dredging in the East Harbor. For informational purposes, stainless steel or concrete sleeves over the existing pilings were not chosen as part of the project due to the deteriorated nature of many of the pilings, and the desire to remove the creosote-treated pilings for water quality purposes. As such, sleeves would only mask the underlying problems of deteriorated and/or creosote-treated wood pilings. In addition, as the docks and slips would be rebuilt, the existing pilings which support them would have to be rearranged to accommodate the new layout, requiring existing pilings to be removed. As described on page 64 of the Initial Study, the proposed removal of creosote-treated pilings would constitute a less-than-significant impact.

COMMENT 11.18

I think a study and review by the Office of Emergency Services would be appropriate within the EIR, because of the life safety issues of the project. Just as engineering studies are provided as a part of this EIR, I believe, a target hardening or a natural hazard study is necessary by OES given the high risk of loss of life that could be caused in a disastrous situation. Why isn't the City's OES needs, why are they not identified in this EIR, particularly when we're talking about seismic activity. (*Commissioner Bradford-Bell, Public Hearing Transcript, October 6, 2005*)

Response 11.18

While review of the proposed project by OES could occur, such a review would not be required as the DEIR did not identify a high risk of loss of life as a result of the proposed project. As noted in DEIR Section III.D, Soils, Geology, and Seismicity, the existing seismic condition of the seawalls in the project vicinity would be neither changed nor worsened by the proposed project, nor expose a new or substantially larger population to the seawalls than under existing conditions. Please also see Response #6.1 for more information. As stated in the DEIR, the risks associated with seismic activity in the project area would be reduced to a less than significant level through application of current building codes, as well as through the implementation of Mitigation Measure GEO-1 requiring a geotechnical investigation prior to renovation and reuse of the former Degaussing Station, and implementation of the engineering recommendations of the report.

COMMENT 11.19

Initial Study, Page 60. Although the *Environmental Cases in the Project Vicinity* section particularly calls out NPS property at Fort Mason, the IS and the following DEIR fail to note that none of the contaminants which are provided mitigation measures or action plans in the DEIR have been documented as releases from Fort Mason. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 11.19

The discussion on page 60 of the Initial Study identifies documented environmental cases in the vicinity of the marina, but does not attempt to identify all of the potential contaminants at all of the environmental cases discussed, as requested by the commenter, nor would such an undertaking be required at this stage. The potential for these documented cases to affect soil or groundwater quality would be evaluated as part of the Phase 1 environmental site assessment (ESA) required prior to construction of landside improvements, in accordance with Mitigation Measure 3 of the Initial Study. As part of this measure, a Phase II ESA would also be conducted if warranted on the basis of the Phase I ESA, to assess the presence and extent of contamination at the site and to recommend the type of remediation to be conducted, if necessary.

COMMENT 11.20

Initial Study, Page 59. The section on Potential Impacts associated with Soil Excavation fails to address how lead based paint in soil associated with documented sources of lead paint may impact health and

safety of workers and recreation users in the vicinity. Further, this section fails to address environmental issues associated with lead in soil. The DEIR neglects to correct this oversight. As such, we suggest collecting soil data for lead and use of the leadspread model to ensure human health and safety and the environment are protected during this project. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 11.20

As discussed on page 62 of the Initial Study, lead based paint has been identified in two samples of exterior paint from the former Degaussing Station. The remaining structures that would be renovated under the project (the existing Harbor Office, East Harbor restroom, and West Harbor restroom) have not been surveyed for lead-based paint and were constructed before the use of lead-based paint was discontinued. These structures would be surveyed for lead-based paint and any lead-based paint would be abated in accordance with legal requirements, including compliance with Chapter 34, Section 3407 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures, prior to renovations. In accordance with this code, any person performing work subject to the code would be required to use containment barriers and appropriate work practices to restrict the migration of lead-based paint during abatement. During the course of the work, the person doing the work must make all reasonable efforts to prevent migration of lead-based paint beyond containment barriers and must remove visible lead-based paint contaminants from regulated areas of the property prior to completion of the work. With compliance with these legal requirements, abatement of lead-based paint conducted as part of the project would not contribute to lead-based paint in the surrounding soil and no further action regarding lead in the soil would be required as part of the proposed project. Measures for protection of workers during abatement activities would be specified in the Health and Safety Plan prepared for the abatement. As such the DEIR appropriately addresses issues related to lead based paint exposure.

Further, the Initial Study, page 61, acknowledges that the project site may contain hazardous materials that have not been discovered as yet.

The Phase I Environmental Site Assessment required for the landside area of the proposed project site (Mitigation Measure 3 of the Initial Study, page 72), would address the potential for contamination of soil in the vicinity of a structure with lead-based paint. As specified in this measure, a Phase II Environmental Site Assessment would be conducted, if warranted, to assess the presence and extent of contamination. Remediation would then be conducted, as necessary, all in coordination with the regulatory agencies.

COMMENT 11.21

Initial Study, Page 64. The section titled *Creosote* fails to document how the project will ensure creosote-treated logs will be classified to ensure compliance with federal regulations. The DEIR provides no additional clarification. We suggest these federal requirements be addressed in the environmental analysis. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 11.21

Creosote treated wood would only be classified as a federally listed hazardous waste if, upon analysis, it exhibited a hazardous waste characteristic. Of the four hazardous wastes characteristics examined under the federal Resource Conservation and Recovery Act (ignitability, corrosivity, reactivity, and toxicity), the only characteristic that could be found in creosote treated wood is toxicity. The EPA technique for evaluating toxicity is the Toxic Characteristic Leaching Procedure (TCLP), which establishes regulatory levels for 39 chemical constituents. If, after applying the TCLP to a particular waste, the waste extract contains concentrations of chemical constituents above any one of the 39 chemical specific regulatory levels, the waste is classified as a federal hazardous waste.

According to the Western Wood Preservers Institute,¹¹ TCLP testing of creosote treated wood by Electric Power Research Institute and Landau Associates, Inc. in 1992 and the Association of American Railroads in 1994 conclusively demonstrated that creosote treated wood products, including marine timbers and pilings, are not a federal hazardous waste. Landfills permitted to accept treated wood could use this “generator knowledge” of the hazardous waste classification or could require TCLP testing of the pilings as a condition of waste acceptance. Because the landfill could not accept pilings without legally appropriate documentation that the pilings do not exhibit a federal characteristic of a hazardous waste, the pilings would not be disposed of without appropriate characterization. Therefore, additional discussion of waste classification for the pilings is not required in the EIR.

COMMENT 11.22

The section titled *Polychlorinated Biphenyls (PCBs) and Other Building Materials* fails to document how those management practices conducted during the project will prevent worker exposure or release to the environment. The DEIR provides no additional clarification. We suggest adding a section in the DEIR to address these project practices. (*Brian O’Neill, U.S. Department of the Interior, January 19, 2006*)

Response 11.22

Management practices to prevent worker exposure and a release to the environment during removal and disposal of these materials would be detailed in the health and safety plan specified in Mitigation Measure 3 of the Initial Study. As described in the measure, specific information to be provided in the plan includes identification of contaminants (such as PCBs and other hazardous building materials), proper material handling procedures, dust suppression methods, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment to be used during construction to verify health and safety of the workers and the public, measures to protect public health and safety, and emergency response procedures. As such, implementation of the specific recommendations of the health and safety plan would prevent worker, public, and environmental exposure to hazardous building materials.

¹¹ Management of Used Treated Wood Products, Western Wood Preservers Institute. Accessed at <http://www.wwpinstitute.org/> on March 9, 2006.

COMMENT 11.23

Secondly, the surface area of a large boat - - with the bottom of the boats they always use phalates or they used to use chromium, and they were toxic and you have to have somewhere to repair them. So, if you have a larger boat and you have a larger surface area, and you increase the size of it, and you take the small boats off, you are going to have more or some sort of water pollution there. (*Commissioner Bill Lee, Public Hearing Transcript, October 6, 2005*)

Response 11.23

While anti-fouling paint used on boat bottoms does contain toxic compounds, boat repair activities that would physically remove paint from the boat bottoms are not conducted at the marina and would not be done under the proposed project; and as such, there would be no increased exposure to toxic materials associated with boat repair. Reconfiguration of the berths under the proposed project would result in a reduction in the overall number of slips at the harbor by about 40 slips, with an increase in slip length of 6.5 feet on average. There would be negligible differences, if any, associated with potential water pollution from leaching of toxic materials from hull paint due to the size of future boats in the marina.

As discussed on page 52 of the Initial Study, the marina would be required to comply with water quality management measures for the protection of water quality during operation of the marina. The management measure for Boat Cleaning and Maintenance requires boaters to minimize the use of potentially harmful hull cleaners and bottom paints, and prohibits discharges of these substances to State waters. Because compliance with this measure would be incorporated as a special permit requirement of the Major Permit, issued and enforced by the BCDC as discussed on page 52 of the Initial Study, water quality impacts related to leaching of anti-fouling paints into the marina waters would be less than significant.

In addition, the project sponsor would implement Improvement Measure 2 of the Initial Study, which would include public education activities to educate marina tenants about the potential water quality impacts related to the use of cleaners, solvents, and paints for boat cleaning and maintenance. Through these activities, the marina would be required to encourage tenants to restrict the use of these materials, educate tenants about more environmentally sound alternatives to the use of these materials, and encourage tenants to minimize underwater hull cleaning and maintenance. Implementation of this improvement measure would provide additional water quality protection from potential impacts associated with boat cleaning and maintenance and would ensure compliance with the Boat Cleaning and Maintenance Management Measure.

CUMULATIVE PROJECTS

COMMENT 11.24

The cumulative impacts analysis section stated that *As envisioned, the E-Line Extension project would be completed in two phases...Phase 2 [of the E-line Extension Project] would extend the E-Line farther west to the Presidio, either along Marina Boulevard entirely, or along Beach and Cervantes Street and a*

shorter stretch of Marina Boulevard. [emphasis added] GGNRA will soon initiate an environmental impact statement (EIS) for an extension of the E-Line from Fisherman's Wharf to the Fort Mason Center. This EIS will evaluate the E-Line extension to Fort Mason only. Please note that although the possibility does exist for a future extension to the Presidio, no NEPA analysis has been completed on this extension, and the preferred alternative and route has not been determined. (*Brian O'Neill, U.S. Department of the Interior, January 19, 2006*)

Response 11.24

Comment noted. Please see Response #9.6 for clarification about the federal environmental review process for the proposed E-Line extension.

D. STAFF-INITIATED TEXT CHANGES

The following changes to the text of the Draft EIR are made in response to comments on the DEIR or are included to clarify the DEIR text. In each change, new language is double underlined, while deleted text is shown in ~~strike through~~, except where the text is indicated as entirely new, in which case no underlining is used for easier reading.

INTRODUCTION

On page I-3, use of the Initial Study checklist in Appendix G of the CEQA Guidelines has been included as follows:

On May 23, 2006, following publication of the Initial Study, the Board of Supervisors adopted Ordinance 116-06, directing that the City employ a CEQA Initial Study Checklist based on the form included in Appendix G of the state CEQA Guidelines. Accordingly, the Planning Department has recently adopted a new Initial Study Checklist, consistent with Appendix G but also incorporating additional questions specific to the urban environment of San Francisco. This new checklist includes some new topic areas that are generally not relevant within San Francisco and, upon consideration, haven been determined not to involve any potential environmental impacts resulting from the proposed project. These topics include agriculture, airports (with regard to noise and hazards), septic systems, flood hazard zones, and mineral resources. The new Initial Study checklist includes a section on recreation, a topic which is addressed under Land Use, Plans, and Policies (Chapter III.A) in the DEIR.

PROJECT DESCRIPTION

On page II-8, Table 1, *Proposed Waterside Improvements*, has been revised as follows for a more accurate description of this project component:

~~Refurbish~~ Construct an enlarged replacement guest dock and add a hand boat launch.

On page II-13, second bullet item, *Proposed Changes to Slip Size and Construction Type*, a more accurate quote from the findings of the San Francisco Marina Renovation Feasibility Study (Moffatt & Nichol, 2002), has been provided as follows:

Approximately 85 percent of the ~~more than 500~~ 498 boaters on the marina waiting list desire slips ~~greater than~~ 30 feet or longer in length.

LAND USE, PLANS, AND POLICIES

On pages S-5 and III.A-9, the accessibility of the breakwaters has been revised as follows:

In addition, the loss of the mole at the foot of Scott Street, which is a popular destination for public viewing, seating, strolling, etc., would not have a significant land use impact, as these uses would continue to be available in other locations at the marina, including the entire length of the Fair's Seawall as well along the ~~new West~~ East Harbor breakwaters.

On page S-5 and III.A-9, the hours of operation of the Harbor Office has been revised as follows:

However, overall usage levels of this facility and hours of operation under project conditions would represent a continuation of an existing use and are not expected to increase compared to current usage levels and hours of operation (8am to 4pm, seven days a week).

On page S-5 and III.A-10, the size of the proposed maintenance building and expanded restrooms, relative to the overall size of the East Harbor open space area has been revised as follows:

The construction of the maintenance building and the expansion of the restrooms in the East Harbor open space area would reduce the usable lawn area by about 0.02 acres, or about 2 percent of the two-acre open space area, a relatively small amount which would not preclude the use or enjoyment of the area for recreational purposes.

VISUAL AND AESTHETIC RESOURCES

On page III.B-16, a distinction has been made between important public viewpoints and scenic views.

Views of boats would continue to be a component of the visual landscape at the marina, and the potential increase in boat size would not substantially degrade or obstruct important scenic, ~~public view~~ points.

HISTORIC RESOURCES

On page III.C-5, the second paragraph is revised as follows to more accurately describe the historic significance of Fort Mason:

Fort Mason was used by the military as a defensive site by colonial Spain 200 years ago, and subsequently by the United States. for over 200 years and Fort Mason became part of the GGNRA in 1977. Fort Mason was ~~listed in the NRHP~~ established as a national historic district in 1972; the district expanded in 1979; San Francisco Port of Embarkation National Historic Landmark was established in 1985, including Lower Fort Mason, its three piers, and associated structures. Fort Mason is also included within the San Francisco Port of Embarkation National Historic Landmark District, listed in the NRHP in 1985.

MITIGATION MEASURES AND IMPROVEMENT MEASURES

MITIGATION MEASURES

On page IV-4, the following mitigation measures have been revised as follows to address project concerns by the National Park Service with regard to potential impacts to Pier 1:

- GEO-3 The project sponsor shall require quantitative modeling for the final design of the breakwater structures to ensure that the breakwaters will perform as intended to protect the harbors from wave action and will not negatively affect Pier 1 and its associated structures. The modeling shall ensure that the project meets the following performance standards: for the East Harbor, a minimum of 50 percent reduction of the design wave for waves from the northeast, and no more than 20 percent increase in design wave height at the Pier 1 piles due to reflection of northeast waves off the floating structure. For the West Harbor, a maximum wave height of 0.5 feet at the berths and the seawall. The quantitative analysis could include collection of field data; structural and geotechnical engineering; physical and/or numerical modeling; and sediment characterization. Monitoring required to measure the potential effects of the project would include periodic visual inspections of Pier 1 for evidence of cracks, scour, or other forms of damage. Identified structural defects shall be repaired promptly by the City. The monitoring program to assess impacts to Pier 1 shall be subject to independent review and closely coordinated between the project sponsor and the National Park Service to ensure agreement on data (including structural baseline information), methods, results and overall duration of the program.
- GEO-4 The project sponsor shall require a geotechnical investigation in the area where the piles for the East Harbor breakwater would be installed, and prepare a pile design analysis to further evaluate the potential pile types and the effects of pile driving. The analysis would be performed to determine if an alternative pile type (such as an open steel pipe instead of concrete or an enclosed system) or installation method (such as predrilling, water-jetting, or using resonance-free vibratory hammers) would minimize vibration and/or liquefaction hazards. If warranted by the analysis, a test pile program shall be conducted to measure underwater vibration as well as piling deflections. If alternative pile types or installation methods would not be effective in minimizing vibration and/or liquefaction hazards, the project sponsor shall conduct vibration monitoring of Pier 1 and associated structures. If construction vibration exceeds an acceptable structural threshold, which shall be designed to assure that vibration from pile-driving does not weaken the structural integrity of Pier 1, pile-driving activities shall cease until an alternative plan can be devised. If no additional alternative pile type or installation methods exist beyond those discussed above to reduce the vibration from pile driving to an acceptable level, the breakwater in the East Harbor shall be constructed after structural improvements to Pier 1 have been completed. The pile design analysis, including a test pile program, shall be subject to independent review and closely coordinated between the project sponsor and the National Park Service to ensure agreement on acceptable vibration thresholds for Pier 1, as well as the alternative pile type or installation methods. The project sponsor shall accept responsibility for the prompt repair of Pier 1 if pile driving activities in the East Harbor were to unintentionally damage this structure.

GEO-5 The project sponsor shall construct the floating breakwater at the East Harbor using a guide-pile system that would allow for disconnection of the float from the piles, and shall accept responsibility for assembly/disassembly in the event that such measures are necessary for access to Pier 1, or any damage that may result from such activities. The project sponsor shall also coordinate with the National Park Service regarding the construction schedule and design for the East Harbor breakwater. Construction activities shall be phased if needed to facilitate access to Pier 1 for the planned repairs and improvements by the National Park Service. The project sponsor shall also investigate whether the East Harbor breakwater could be designed and constructed concurrently with NPS's Pier 1 seismic upgrade project, to ensure compatibility between the two structures.

On page IV-5, the following mitigation measures have been revised as follows to address project concerns by the National Park Service with regard to potential hazardous materials impacts to Fort Mason:

HAZ-1 The project sponsor shall require the dredging contractor to prepare a dredged material disposal plan specifying methods to segregate sediment for disposal, appropriate disposal methods for sediments, an approved disposal site, written documentation that the disposal site would accept the sediment, procedures and requirements for loading and off-loading sediments to reduce the potential for spillage, and a cleanup plan outlining procedures to be followed if a release occurs. The contractor would be required to submit the plan to the project sponsor for acceptance and to the NPS for review and input prior to implementation. The plan might also be subject to regulatory approval, and if so, the project sponsor shall require the contractor to comply with all regulatory requirements.

HAZ-2 The project sponsor shall require the dredging contractor to prepare and implement a site health and safety plan that would identify the chemicals present, potential health and safety hazards, monitoring to be performed during site activities, sediment handling methods required to minimize the potential for exposure to harmful levels of chemicals identified in the sediment, appropriate personnel protective equipment, and emergency response procedures. The plan shall be provided to the project sponsor and NPS for review and input.

OTHER CEQA TOPICS

ADDITIONAL IMPROVEMENT MEASURES

On page IV-6 and S-22, the following improvement measure has been included to address visual concerns related to the placement of the proposed maintenance building in the East Harbor open space area:

VIZ-1 – Location of the Maintenance Building

Select a location for the maintenance building that maximizes both preservation of the existing open space and protection of existing views. Work with the community to identify the preferred location for the structure.

The topic of transportation impacts was considered in the Initial Study and it was determined that there would be no significant impacts related to transportation resulting from the proposed project. However,

during the DEIR review period several comments addressed transportation issues, including the Bay Trail and the issues around the transition from Fort Mason to the marina. While no significant impacts from the proposed project for either vehicles or Bay Trail users are expected, the increased activity in the boat hoist area that would occur and the lack of clear directional signage creates conditions that could be alleviated through implementation of an additional improvement measure. Accordingly, page V-6 and S-22 of the DEIR have been revised to include the following transportation measure related to concerns about the Bay Trail alignment in the East Harbor:

OTHER-1 – Bay Trail Signage in the East Harbor

Provide signage or other directional materials as appropriate to indicate the location of the Bay Trail alignment on the marina property, particularly in the East Harbor area. Coordinate with the San Francisco Bicycle Coalition, the National Parks Service, the Fort Mason Foundation, Bay Trail project staff, and other appropriate interested parties in efforts to improve conditions for Bay Trail users on marina property, particularly in the East Harbor area.

ATTACHMENT 1: COMMENT LETTERS

**San Francisco Marina Renovation Project Draft EIR Written Comments Log
Case No. 2002.1129E**

Commenter Name	Agency/Organization	Date	Comment Type
Richard H. Robinson	Individual	09/06/05	Letter
Timothy C. Sable	Department of Transportation	09/20/05	Letter
Michael Spiegel	Individual	09/27/05	Letter
Ronald J. Mulcare & Edward J. Barret	Individuals	09/27/05	Fax
Alan Silverman	Individual	10/01/05	Letter
Denise M. Tsuji	N. California – Coastal Cleanup Operations Branch, DTSC	10/5/05	Letter
Judith Berkowitz	Coalition for San Francisco Neighborhoods	10/06/05	Letter received at CPC
Anonymous	Letter Titled “The Repair and Replace Alternative”	10/06/05	Letter received at CPC
Joan Girardot	Marina Civic Improvement & Property Owners Association	10/06/05	Letter received at CPC
Bridget Maley	San Francisco Landmarks Preservation Advisory Board	10/14/05	Letter
Brian W. Veit	Individual	10/17/05	Letter
Nathaniel Berkowitz	Individual	10/18/05	Letter/Fax
Greg Milano	Individual	10/18/05	Letter
Robert C. Doss	PG&E	10/19/05	Letter
Maureen Gaffney	San Francisco Bay Trail	10/19/05	Letter
Stuart M. Flashman	SF Bay Chapter of the Sierra Club	10/20/05	Letter/Fax
Ralph Kanz	Individual	10/20/05	E-mail
Michelle Burt Levenson	SF Bay Conservation and Development Commission	10/20/05	Letter
Will LeRoy	Individual	Undated	Letter
Bruce Munro	Individual	1/16/06	Letter
Howard Strassner	Sierra Club San Francisco Group	1/17/06	Fax
Alexander Zwissler	Fort Mason Center	1/17/06	Letter
Alan Silverman	Marina Community Association	1/18/06	Letter
Dee Dee Workman & Michael Alexander	San Francisco Beautiful	1/18/06	Letter
Brian O’Neill	United States Department of Interior, GGNRA	1/19/06	Letter

**San Francisco Marina Renovation Project Draft EIR Written Comments Log
Case No. 2002.1129E**

Commenter Name	Agency/Organization	Date	Comment Type
Sue Chang	Marina Community Association	1/19/06	Letter
Maureen Gaffney	San Francisco Bay Trail	1/19/06	Letter
Joan Marie Girardot	Marina Civic Improvement & Property Owners Association	1/19/06	Letter
William Palmer	Individual	1/19/06	Emailed letter
Mick Suverkrubbe and Jordanna Thigpen	Marina Merchants Association	1/19/06	Emailed letter
Andy Thornley	San Francisco Bicycle Coalition	1/19/06	Letter

City & County of S.F.
Dept. of City Planning

SEP 12 2005

OFFICE OF
ENVIRONMENTAL REVIEW

Richard H. Robinson
2033 Jefferson Street
San Francisco, CA 94123

September 6, 2005

Ms. Lisa Gibson
Environmental Coordinator
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA. 94103

RE: Comments on the Draft EIR for the SF Marina Renovation Project

Dear Ms. Gibson,

I have read the Draft Environmental Impact Report for the San Francisco Marina Renovation Project (DEIR at www.sfmarina.org). I commend you and staff for a very thorough report. However, I believe you have overlooked a very significant factor.

While the St. Francis Yacht Club is, technically, not within the Project Area (as pointed out numerous times) you have not touched upon any effect this project will have on the Club. The St. Francis Yacht Club (SFYC) is the SF Marina's largest and most important tenant. The SFYC is also one of the largest employers in the Marina District and contributes to the City and Marina area in many significant ways. I believe the operation and function of the SFYC will be adversely affected during the construction of this project, as portions of the Marina are rendered temporarily inoperable. There is no mention of this impact on the Club.

The shortcoming outlined above will be somewhat temporary, however. The real permanent and very adverse effect the Project has on the Club is to be found in the future plan for the distribution of new slips (on page 183). In this plan the existing turning basin is radically reduced by the extension of the middle row of slips. This will make the safe and navigable operation of large guest vessels and regatta fleets (the lifeblood of the SFYC) difficult or impossible. Plainly stated, the existing amount of turning radius MUST be preserved in the future plan in order to allow for normal and typical vessel traffic to occur in the future.

There must be a different distribution of the new slips in order to provide for a proper turning radius near the large slips adjacent to the SFYC premises. There is another small but related error that I'd like to point out. On page 87 it is noted that the San Francisco Yacht Club constructed the Club in 1927 on the St. Francis Spit. Please note that the St. Francis Yacht Club built the Clubhouse in 1927 as it spun off from the San Francisco Yacht Club, which was then based in Sausalito and bound for Belvedere. A significant reason for the spit and relocation of the new SFYC to the City was the presence of deeper water and a proper harbor with enough room for the SFYC members' larger boats. Any reduction of the current turning radius will be an issue for the Club.

Sincerely

2.8

5.3

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5605
FAX (510) 286-5559
TTY (800) 735-2929

City & County of S.F.
Dept. of City Planning

SEP 23 11:15

OFFICE OF
ENVIRONMENTAL REVIEW

September 20, 2005

Ms. Lisa Gibson
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Ms. Gibson:

San Francisco Marina Renovation Project – Draft Environmental Impact Report (DEIR)

Thank you for including the California Department of Transportation (Department) in the environmental review process for the proposed project. We have reviewed the DEIR and have the following comment to offer:

Encroachment Permit

Please be advised that any work or traffic control within the State ROW will require an encroachment permit from the Department. To apply for an encroachment permit, submit a completed encroachment permit application, environmental documentation, and five (5) sets of plans (in metric units) which clearly indicate State ROW to the following address:

Mr. Sean Nozzari, District Office Chief
Office of Permits
California Department of Transportation, District 04
P. O. Box 23660
Oakland, Ca 94623-0660

Should you have any questions regarding this letter, please call Alice Jackson of my staff at (510) 286-5988.

Sincerely,

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

Caltrans improves mobility across California

Lisa Gibson
Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2412

Project Re: Draft EIR for the San Francisco Marina Renovation
Planning Department Case No.2002.1129E: State
Clearinghouse No. 2003122131

The following comments are about the expansion of the East Harbor public restrooms and the construction of a maintenance building in the middle of the East Harbor open space.

Summary of Comments

- 1) The proposed maintenance building on the East Harbor open space does not further any of the Project Sponsor's Objectives;
- 2) The proposed maintenance building is inconsistent with the San Francisco General Plan and Planning code;
- 3) The proposed maintenance building will unacceptably interfere with recreational and open space uses on the East Harbor open space, and will have a substantial adverse impact on the project site and the neighborhood character of the site's vicinity;
- 4) The proposed maintenance building will substantially degrade and obstruct publicly accessible scenic views, substantially degrade the existing visual character and quality of the area, and will result in a substantial demonstrable negative effect;
- 5) The Draft EIR does not consider the alternatives of not building the proposed maintenance building nor of locating it elsewhere; and,
- 6) The Draft EIR does not consider the public implications of showers at the East Harbor restrooms.

Project Sponsor's Objectives

The five objectives of the project sponsor, the San Francisco Recreation and Park Commission and the San Francisco Recreation and Park Commission, are listed on page II-12 of the Draft EIR. No mention is made, directly or indirectly, of the need for a new maintenance building to replace the larger more accessible facility at the SFPUC Pump Station

now being used. The Draft EIR at S-3 states: "With the construction of the new maintenance building for material storage, the Recreation and Park Department would no longer use the existing 1500-square foot SFPUC pump station in the West Harbor, which would remain unoccupied." Table 2 on II-10 confirms this. How building a 1000-square foot structure in the middle of a grass open space so that an existing 1500-square foot space can become and remain unoccupied defies understanding. No objective of the project is advanced by this obvious waste of taxpayer's money.

The General Plan and the Planning Code

Construction of the proposed maintenance building would, as explained below, conflict with three of the elements of the San Francisco General Plan and Section 101.1 of the Planning Code (Prop M).

Open Space and Recreation Element

Policy 2.2: Preserve existing public open space.

Urban Design Element

Policy 1.1: Recognize and protect major views in the city, with particular attention to those of open space and water.

Policy 3.2: Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance.

Environmental Protection Element

Policy 3.2: Promote the use and development of shoreline areas consistent with the General Plan and the best interest of San Franciscans. Planning Code Section 101.1 Priority Policies (8) protection of open space.

If one picture is better than a thousand words, Figure 6 on p. III.B-9 says it all. Clearly the proposed maintenance building sited virtually in the middle of the East Harbor open space dominates the space. From almost any angle on Marina Blvd. between Webster and Buchanan streets the proposed building blocks views of trees, water and distant vistas. It would stand out like a sore thumb. This happens because the proposed building is sited close to the middle of the space.

The Draft EIR's contention that the view of Tiburon is already partially blocked by the trees that will be obscured by the proposed building (III.B-8) is disingenuous. There is a vast aesthetic difference between views of grass and distant trees and a close up view of a maintenance building. The argument that there already is a building, the public restrooms, on the

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3.3

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2.5

space and therefore the open space is already degraded is similarly flawed. The restroom building is sited on the far corner of the space abutting the parking lot, and does not dominate the space as would the proposed maintenance building. Were the proposed maintenance building constructed, it would be the dominant view out of the living room windows of the Marina BLVD homes across the street from the East Harbor open space. It would also be an eyesore to pedestrians and users of the open space.

4.3
cont

The siting of the proposed building would interfere with recreational uses of the open space. The space is presently used by families with young children, and young adults playing games that require open space. A maintenance building in the middle of the space is incompatible with this use. This is particularly so when one considers, as the Draft EIR does not, that a driveway to the building will be necessary for maintenance trucks which are likely to be parked most of the time next to the building. The coming, going and parking of vehicles on the open space will transform its character to that of an industrial area. The Draft EIR contention that the proposed building will only use 2% (not 0.02% as stated at S-5 and III.A-10) of the 2 acre open space and therefore will not interfere with recreational and open space uses is immaterial because it ignores the siting of the proposed building.

3.2

Alternatives

The Draft EIR does not consider the alternative of not building the proposed maintenance building. No other aspect of the project is dependent on the proposed maintenance building. Indeed, the Draft EIR concedes that a larger space at the SFPUC Pump Station at the West Harbor currently serves the same purpose and will become vacant if the proposed building is built.

10.4

If for some reason that has not been articulated in the Draft EIR, the proposed building is necessary, it could be located north of the public restrooms at the West Harbor near the SFPUC Pump Station. See Figure 3 at II-7. That location abuts an existing driveway and would not block any views nor interfere with recreational use of the surrounding space. This alternative should also be considered.

East Harbor Public Restrooms

3.5

The Draft EIR proposes an expansion of the East Harbor public

restrooms to provide shower facilities for harbor tenants. See Table 2 at II-10 and II-11. The Draft EIR does not consider the implications of tenant only showers with the Board of Supervisors Resolution requiring that all city restroom facilities be open to the public to alleviate homeless persons issues. Is this an appropriate place for a public bath house? If tenant showers are necessary at the East Harbor, they should be located within the confines of the Waterside Improvements.

3.5
cont

Respectfully submitted,

Michael I Spiegel
181 Marina BLVD
San Francisco, CA 94123
415 922 5716
mis181@pacbell.net

City & County of S.F.
Dept. of City Planning

SEP 28 2005

September 27, 2005

September 27, 2005

OFFICE OF
ENVIRONMENTAL REVIEW

Linda Avery, Secretary to the Planning Commission

Ronald J. Mulcare
655 Marina Blvd.
San Francisco, CA 94123

Fax 415 558 6409

Edward J. Barrett
727 Marina Blvd.
San Francisco, CA 94123

Please copy and timely distribute the letter herewith
to the Members of the Planning Commission.

Sue Lee, Commission President, and
The Honorable Members of the
San Francisco Planning Commission
1660 Mission Street, Fifth Floor
San Francisco, CA 94103

Sincerely

Ron Mulcare
415 567 8119

Re: SF Marina Renovation Project DEIR
Hearing October 6, 2005
Case No. 2002.1J29E

Dear President Lee and Honorable Members of the Commission:

A reading of the Draft Environmental Impact Report (DEIR) makes it
apparent that serious environmental issues have not been address, or at
least not adequately addressed. While acknowledging the Project will
cause impacts, the Report simply sloughs these serious impacts
off by saying they will be addressed during design or
construction or by future studies. In so doing the DEIR clearly shows
its inadequacy in addressing serious environmental issues and it vividly
demonstrates poor planning.

2.4

The DEIR is defective for its failure to properly address a host of
issues, e.g., traffic and noise and vibrations during construction (An EIR is
required even in those situations where the impacts are temporary, such
as those caused by pile driving, truck hauling, etc., during construction. No
Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68.), the placing of fill in
the Bay for breakwaters, the reconstruction of the Degaussing Station on
the Marina for commercial use, etc.

9.10

However, this letter, which should be made part of the permanent
record in this matter, will focus on the inadequacies of the DEIR as it
relates to the **Seawalls**, the Fair's Seawall and the Marina Boulevard
Seawall, without which the West Harbor would not exist. These Seawalls

form and are an integral part of the Harbor. See DEIR, Fig. 2, which graphically shows the location of the Marina Boulevard Seawall which forms a southerly portion of the West Harbor and the Fair's Seawall which forms another southerly portion of this Harbor. These Seawalls have been found by the City itself to be seismically defective. Since the Project does not include their seismic retrofitting, the failure of either of these Seawalls during an earthquake will be destroying the Harbor.

6.1

BACKGROUND

From the Report (90-253) of the Department of the Interior, U.S. Geological Survey, dated April 20, 1990 it appears these antiquated Seawalls were built long ago, before seismic construction standards were established. The first portion of the Fair's Seawall was built around 1894 (but most of the fill behind it was not placed until after the 1906 Earthquake so during that Quake it did not carry the load now behind it) and the Marina Boulevard Seawall was built around 1912, according to this Federal Report. Not surprisingly, this Report also determines the Seawalls are in an area subject to liquefaction and, because of the nature of the soil in the Marina, ground motion amplification, lateral spreading and vertical settlement will occur during an earthquake.

6.1

Since these structurally inadequate Seawalls are an integral part of the West Harbor, their upgrade should be part of any multimillion dollar Harbor Improvement Project. No commercial lender would finance Harbor improvement if the Seawalls were not retrofitted. Cal. Har. & Nav. C. Sec. 71.4(b).

6.2

STATE AND CITY DETERMINATIONS

The State of California through its Department of Conservation, Division of Mines & Geology, has determined both the Marina Seawall and the Fair's Seawall are located in areas subject to liquefaction. In its Official Map of Seismic Hazard Zones for the City and County of San Francisco, released November 17, 2000 the State mandates that since the Seawalls are in areas "where historic occurrences of liquefaction" have taken place, "mitigation" measures "consistent with established practices and that will reduce seismic risk" are "required". See Seismic Hazards Map and Pub. Res. C. Sec. 2693(c). Cities and counties shall require, prior to approval of a project located in a seismic hazards zone, a geotechnical report". Sec. 2697(a). This is specifically required of the City and County of San Francisco. Sec. 2693(a). San Francisco Building Code Section 1804.5 similarly requires a seismic report before a project can proceed. The DEIR admits that no such report has been prepared to date for this

Project. See DEIR, pp. S-12 and III.D-8-10.

6.2
↑ cont

Following the 1989 Loma Prieta Earthquake the Board of Supervisors established a Task Force to Study seismic safety issues in the Marina. This study was undertaken by the City's Department of Public Work with citizen input. This effort produced the Marina District Liquefaction Report in July 1991 recommending certain earthquake safety measures be implemented. The measures were assigned priorities. The number one priority in the Report is the retrofitting of the Marina Seawall and the number three priority is the Fair's Seawall to bring both into conformity with current seismic safety standards.

POOR PLANNING AND INADEQUATE DEIR

The above clearly shows that by proceeding with the Harbor Renovation Project as envisioned in the DEIR without retrofitting the admittedly seismically defective Seawalls is at a minimum very poor planning. But the DEIR also does not satisfy the requirements of CEQA and is inadequate as a matter of law.

CEQA establishes a broad policy to regulate both private and public activities which may cause an effect on the environment. Friends of Mammoth v. Board of Supervisors (1972) 8 Cal.3d 247. No deference is to be given to the Staff's determination that a DEIR is adequate. Sierra Club v. County of Sonoma (1992) 6 Cal.App. 4th 1307, 1318.

1.4

As to the Seawalls, the DEIR acknowledges there are at least two environmental impacts. They are to Historical Resources and Soils, Geology and Seismicity. See DEIR pp. S-8 and 11.

As to seismicity the DEIR admits, as it must, "The project site is located in an area that would be subject to strong ground shaking and potential liquefaction" in the event of an earthquake of the Loma Prieta Quake's intensity and that "During future earthquakes, liquefaction could damage one or both of the marina seawalls." DEIR p. S-11. What does the DEIR recommend to mitigate this damage to the Seawalls that are an integral part of the West Harbor? Nothing, with the exception that at the site of removal of the mole at the foot of Scott Street a toe may be constructed for a small portion of the Fair's Seawall. DEIR p. IV-3-4. Nothing is to be done to upgrade or retrofit the Marina Seawall ("do nothing" and "repair...after an earthquake". DEIR p. III.D-9) or most of the Fair's Seawall, including that part of the it where the Breakwater is to tie into the Fair's Seawall.

6.1

Similarly, under Historic Resources the DEIR concedes the Fair's Seawall qualifies as an "historic resource at the federal and state level".

DEIR p. S-8. The proposed breakwater is to be constructed so that it ties into the Fair's Seawall and, with the removal of the Scott Street mole, another portion of the Fair's Seawall will be impacted. "Damage or substantial alteration to a historically significant resource is considered a potentially significant impact under CEQA." DEIR p. S-9. What does the DEIR propose to do about these significant impacts to the Seawall? **Nothing!** All the DEIR proposes is to study the matter further during design, use standards during construction and submit additional reports. DEIR p. IV-2. The DEIR is supposed to address environmental impacts, not consider them at some future date.

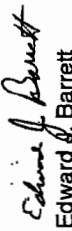
5.4

CONCLUSION

The DEIR should be rejected as inadequate until the Project is significantly amended to include retrofitting of the Seawalls and until other significant environmental issues are addressed.

Sincerely,


 Ronald J. Mulcare


 Edward S. Barrett

ALAN SILVERMAN
 185 MARINA BOULEVARD
 SAN FRANCISCO, CA 94123

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Phone: 415-346-4164

City & County of S.F.
 Dept. of City Planning

OCT 04 2005 1 October 2005

Dennis J. Herrera, Esq.
 City Attorney
 City Hall, Room 234
 San Francisco
 CA 94102

OFFICE OF
 ENVIRONMENTAL REVIEW

Dear Sir:

Re: San Francisco Marina Renovation Project
Draft Environmental Impact Report
San Francisco Planning Department Case No. 2002.1129E

I am writing to you because I believe that the above-referenced Draft Environmental Impact Report ("DEIR") is being prepared in violation of Section 29.2 and Section 29.7 (as amended on July 19, 2005) of the San Francisco Administrative Code and I wish to urge you to suspend the processing of this DEIR until this matter has been resolved.

Chapter 29 of the code was clearly designed to prevent the expenditure of public money on an environmental impact report, until the Board of Supervisors has determined that the proposed project is fiscally feasible and responsible. Section 29.7 originally required any proposed project that had not completed environmental review as of January 27, 2004 to suspend the review. Section 29.7 was amended on July 19, 2005 to allow such reviews to continue, provided that the project sponsor submits to the Board of Supervisors within 30 days of effective date of the ordinance the materials required for a determination of fiscal feasibility.

In order to understand why the above referenced project violates Chapter 29 it is necessary to understand the following sequence of events concerning the project.

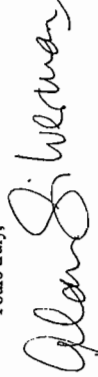
- December 27, 2003 Preliminary Mitigated Negative Declaration ("PMND") published.
- January 27, 2004 Chapter 29 of Administrative Code passed.
- February 9, 2004 Notice of Appeal filed concerning the PMND.

- January 14, 2005 Nadia Sesay of the Mayor's Office of Finance advised the Marina Harbor Working Group that a fee increase schedule that includes a 37% increase in fiscal year 2011 is necessary to make the renovation project fiscally feasible and financially responsible.
- February 17, 2005 Recreation and Parks Commission passed a resolution to recommend a fee increase schedule to the Board of Supervisors, which schedule included a 37% fee increase in fiscal year 2011.
- March 3, 2005 Nadia Sesay of the Mayor's Office of Finance repeated her original advice to Marina Harbor Working Group that a fee increase of 37% in fiscal year 2011 is necessary to make the project fiscally feasible and responsible.
- March 19, 2005 Notice of Preparation of Environmental Impact Report.
- June 2, 2005 The Budget Analyst reported to the Budget & Finance Subcommittee that he was instructed by Michael Martin of your office that a 37% fee increase for the Marina in fiscal year 2011, which is required to make the project fiscally feasible and financially responsible, cannot be proposed until after completion of the Environmental Impact Report.
- June 16, 2005 Fee Increase schedule for Marina approved by Budget & Finance Subcommittee, without the 37% increase in 2011.
- June 16, 2005 Resolution adopting findings that the Marina project is fiscally feasible and financially responsible was originally presented to the Budget & Finance Subcommittee, but then withdrawn.
- July 12, 2005 Fee Increase schedule for Marina passed by Board of Supervisors, without the 37% increase in 2011.
- July 19, 2005 Section 29.7 amended in an apparently transparent attempt to retroactively cover the Marina Environmental Impact Report.
- September 6, 2005 Draft Environmental Impact Report published.

Thus we find ourselves in a situation where the Environmental Impact Report was started in March 2005 in violation of Chapter 29. The attempt to retroactively correct this problem by amending Section 29.7 does not correct the problem because the Board of Supervisors has been told by the Budget Analyst and the Mayor's Office of Finance that the approved fee schedule enacted by the Mayor does not make the project financially feasible or fiscally responsible.

The amended Section 29.7 requires material for a determination of fiscal feasibility to have been submitted to the Board of Supervisors within 30 days of the effective date of the ordinance. As of the date of this letter the required material has not been considered by the Board of Supervisors. Furthermore, there is no authority to approve the 37% increase and therefore there is no established feasibility for the Marina Project. In any case, it appears that the current environmental review process is violating the provisions of Section 29 of the Administrative Code. I urge you to suspend this process until the Board of Supervisors has taken all appropriate actions to remedy the matter.

Yours truly,



Alan Silverman

cc: Sue Lee, President of the San Francisco Planning Commission
 Dean Maerts, Director of Planning
 ✓ Paul Maltzer, Environmental Review Officer



Department of Toxic Substances Control

700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

Alain C. Lloyd, PhD
Agency Secretary
CalEPA



Arnold Schwarzenegger
Governor

October 5, 2005

City & County of S.F.
Dept. of City Planning

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission St, Suite 500
San Francisco, California 94103

OCT 07 2005

OFFICE OF
ENVIRONMENTAL REVIEW

Dear Mr. Maltzer:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (SCH #2003122131) for the San Francisco Marina Renovation Project. As you may be aware, pursuant to the California Health and Safety Code, Division 20, Chapter 6.8, the California Department of Toxic Substances Control (DTSC) oversees the cleanup of sites where hazardous substances have been released. As a potential Resource Agency, DTSC is submitting comments to help ensure the environmental documentation prepared for this project under California Environmental Quality Act (CEQA) adequately addresses any remediation activities pertaining to releases of hazardous substances.

According to the report, the project consists of waterside and landside improvements to the existing San Francisco Marina. Proposed waterside improvements include modifying breakwaters, repositioning riprap, renovating boat services and public access docks, replacing creosote-treated wood piles with concrete piles, modifying slip sizes and configurations, upgrading utilities, replacing gangways and gates, and dredging.

The draft report does not include a thorough description of the property's historical uses, without which we are unable to determine whether hazardous substances may have been released to the soil at the Site. Although the report associates the presence of polynuclear aromatic hydrocarbons (PAHs) in the sediments of the East Harbor with a manufactured gas plant that "existed southeast of the project site," no further related information is presented. We strongly recommend a historical assessment of past activities related to the gas manufacturing plant and any other past uses. Based on that information, additional sampling should be conducted to determine whether additional issues need to be addressed in the CEQA compliance document. If hazardous substances have been released to the soil at the site, this contamination will need to be addressed as part of the project.

For example, if the proposed landside improvements, including the expansion of public

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Mr. Paul Maltzer
September 19, 2005
Page 2

facilities, construction of an additional building and landscaping include the need for soil excavation and remediation, the CEQA document should include: (1) an assessment of air impacts and health impacts associated with soil excavation activities; (2) identification of applicable local standards, which may be exceeded by the excavation activities, including dust levels and noise; (3) transportation impacts from the removal or remedial activities; and (4) risk of upset if an accident occurs at the Site.

DTSC and the Regional Water Quality Control Boards (Regional Boards) signed a Memorandum of Agreement (MOA), March 1, 2005 aimed at preventing duplication of efforts among the agencies in the regulatory oversight of investigation and cleanup activities at brownfield sites. Under the MOA, anyone requesting oversight from DTSC or Regional Board must submit an application to initiate the process to assign the appropriate oversight agency. The completed application and site information may be submitted to either DTSC or Regional Board office in your geographic area.

Please contact me at (510) 540-3824 if you have any questions or would like to schedule a meeting. Thank you in advance for your cooperation in this matter.

Sincerely,

Denise M. Tsuji, Unit Chief
Northern California - Coastal Cleanup Operations Branch

cc: Governor's Office of Planning and Research
State Clearinghouse
PO Box 3044
Sacramento, California 95812-3044

Guenther Moskat
CEQA Tracking Center
Department of Toxic Substances Control
PO Box 806
Sacramento, California 95812-0806

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COALITION FOR SAN FRANCISCO
NEIGHBORHOODS

PO Box 320098 • San Francisco 94132 • 415-262-0240 • www.csfm.net

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Mission Terrace Improvement Ass'n
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Outer Mission Residents Association
Parkside Residents

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Sunset Peninsula Education
Sunset Peninsula Education
& Action Committee
Telegraph Hill Dwellers
Telegraph Hill Civic Council
& Open Space Conservancy
Twin Peaks Improvement Association
Van Ness Neighbors
West Presidio Neighborhood Association

2008.11.29E

(Anonymous)

The Repair and Replace Alternative

- Repair and make replacements as needed to the existing harbor facilities with the existing layout and the existing berth size distribution.
- Do the necessary dredging and sand mining.
- No new building construction or building additions.
- No additional West harbor breakwaters.
- Demolition of Degaussing Station and return of the site to Open Space.
- Seismically retrofit the Marina Boulevard and the Fair's Seawalls.

10.1

October 2, 2005

2008.11.29E
S.F. MARINA RENOVATION PROJECT
(L. GIBSON)

President Sue Lee, Planning Commissioners
Planning Commission
1680 Mission Street, 5th Floor
San Francisco CA 94103

Re: Item 23. SAN FRANCISCO MARINA RENOVATION PROJECT -
Draft Environmental Impact Report Public Hearing - Case #
2002.1129E

Honorable Commissioners,

At the Executive Committee meeting of the Coalition for San Francisco Neighborhoods on September 28, 2005 the following resolution was unanimously approved:

Resolved that the Executive Committee of the Coalition for San Francisco Neighborhoods urges the Planning Commission to recommend to the Recreation and Parks Department to retain all 282 berths for small boats at the Marina Harbor.

2.9

We look forward to your support for retaining the berths for small boats at the Marina Harbor.

Thank you.

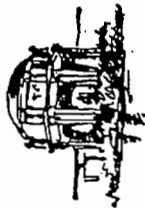
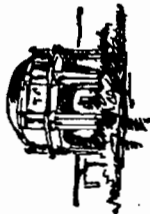
Sincerely,

Judith Berkowitz
President

RECEIVED AT CPC HEARING 10-6-05
2008.11.29E
S.F. MARINA RENOVATION PROJECT
(L. GIBSON)

L Gibson

Rec'd
02-09-04
4:50 PM
BF



Marina Civic Improvement & Property Owners Association
P.O. Box 470790 • Marina Station • San Francisco, CA 94147-0790

Marina Civic Improvement & Property Owners Association
P.O. Box 470790 • Marina Station • San Francisco, CA 94147-0790

October 6, 2005

Honorable Sue Lee, President
Honorable Members
San Francisco Planning Commission
1660 Mission Street 5th Floor
San Francisco, CA 94103

Re: Hearing October 6, 2005
SF Marina Renovation Project
Case No. 2002.1129E

Dear President Lee and Members of the Commission,

With this letter, I am resubmitting our Appeal dated 2/9/2004 of the Preliminary Mitigated Negative Declaration for this project, as well as our letter dated 4/22/2005 in response to the Notice of Preparation/Initial Study. I request that the Appeal and letter be made a part of the permanent record of this Hearing.

Issues raised in the Appeal and letter were not adequately addressed in the DEIR. It has come to our attention that the Commissioners may not have been presented with these documents.

I am resubmitting these documents for further evaluation in the FEIR.

Sincerely,

Joan Girardot

Joan Girardot
Secretary

February 9, 2004

Planning Department
City & County of San Francisco
Attn: Paul Maltzer, Environmental
Review Officer
1660 Mission Street, Suite 500
San Francisco, CA 94103

NOTICE OF APPEAL
Preliminary Mitigated Negative Declaration
2002.1129E - San Francisco Marina Renovation

NOTICE OF APPEAL IS HEREBY given that the Undersigned, including those persons whose signatures appear on the attached forms entitled "Appeal of Preliminary Negative Declaration for Proposed San Francisco Marina Renovation Project," individually and on behalf of Marina Civic Improvement & Property Owners Association, appeal to the Planning Commission the determination of the Planning Department not to prepare an Environmental Impact Report (EIR) for the San Francisco Marina Renovation Project (Project) but instead to prepare and publish a Mitigated Negative Declaration (MND). A check to cover the filing fee is enclosed.

This appeal is based upon each the grounds stated below which indicate that the Project MAY have an adverse effect on the environment. Accordingly, the Planning Commission must direct and order the Planning Department to prepare an EIR for the Project as required by the California Environmental Quality Act (CEQA). Friends of B Street v. City of Hayward (1980) 106 Cal.App.3d 988 ("May" have effect); Cal.C.Reg., Title 14, Sec.15064(f)(1). (Title 14 of the California Code of Regulations will be cited herein as "Reg.")

A. MASSIVE PROJECT

This Project is a major undertaking. The City is seeking a \$38,900,000 loan from the State for its implementation. (Estimate for construction costs is \$26,037,000.) MND p.11. The Project covers a vast area of environmentally sensitive Bay waters and park and Open Space lands. Project construction will take place

over the "entire 39-acre" water area of the Marina and an admitted 12 acres of park and Open Space land. MND p4. (Actually a greater number of acres of land is involved. The Planning Staff expressly directed that some of the Project area not be included in the MND analysis to intentionally mislead and deceive the public. MND p5, Fig.3, and letter, Sept.26,2003, discussed below as one of the grounds for appeal.)

Other facts vividly show the Project's environmental disruptiveness. 1) Construction will take a full 3 years. MND p11. The neighborhood disruption will be horrendous. 2) Some 750 concrete piles 40 to 60 feet long will be driven over an extended period of time. MND p7. The Staff understandably anticipates neighborhood complaints from the resulting noise and vibrations. MND p51.3. The three massive new breakwaters will require the placement of 16,350 cubic yards (441,450 cubic feet) of material below Mean High Tide (MHT) in the Bay. MND p6. This quantity of material, which does not include the substantial part of the breakwaters above MHT, represents about 3,275 large semi-double axle dump truck loads, if the trucks have a 10 ton load capacity. Of course, trucks must also exit the Project site. 4) There will be an additional 12,000 cubic yards (324,000 cubic feet) of material taken out of the job site with the removal of the historic moles. (breakwaters) currently at the foot of Scott Street in the Inner West Harbor. Again, this does not include that part of the moles above MHT. This 12,000 cubic yards alone represent another 2,400-truck loads of material to be removed. These represent only some of the construction aspects of the Project.

There is no doubt that if a private developed undertook a project of this scale in this environmentally sensitive area of the Bay, an EIR would be required. (Compare the City's massive Marina Project, for which the Planning Staff says no EIR is needed, with the homeowner Francis Martin, who wants to raise the height of his living room ceiling, for which the Staff reportedly requires a full EIR). However, the same environmental laws, regulations and policies apply equally to projects undertaken by public entities. They apply to the City.

The very magnitude of this Project, its many discrete components, together with its unique world class natural and scenic setting, its historical and cultural resources, the area's heavy public use, and the fact that the Project is a major expansion of the footprint of the West Harbor and major encroachment of Harbor facilities over the entire public shoreline Open Space north of Marina Blvd dictates that an EIR is required.

Furthermore, preparation of an EIR would better serve City decision-makers on the Board of Supervisors because, in an EIR, alternatives to the proposed project would have to be identified. These alternatives could then be evaluated for environmental effects and compared with the proposed Harbor design.

For example, an alternative project design which would preclude construction of additional West Harbor breakwaters, would preserve the existing historic Inner West Harbor moles (breakwaters), would keep maintenance dredging needs at current levels, would remove all berths in the Outer West Harbor, and would keep the Harbor Office in its present location, should be evaluated. This alternative would be less environmentally risky, more environmentally sensitive to the scenic site, far less costly, while still achieving the stated project goal of a renovated harbor with improved facilities and a longer useful life. No alternative plan without construction of additional West Harbor breakwaters has been evaluated. No alternative plan without expansion of the footprint of the West Harbor and without major encroachment of Harbor facilities on the public shoreline Open Space has been evaluated.

B. THE LAW REQUIRES PREPARATION OF AN EIR

CEQA establishes a broad policy to regulate both private and public activities which may cause an effect on the environment. Friends of Mammoth v. Board of Supervisors (1972) 8 Cal.3d 247. In pursuing a public project, agencies are required to "give major consideration to preventing environmental damage." Reg.15021(a)(1).

CEQA defines the environment to include "the physical conditions which exist within the area which will be affected by a proposed project," and is not limited to the project boundaries as the City improperly attempts to do here. Pub.Res.C.Sec.21060.5. It includes "land,air,water,minerals,flora,fauna,noise,objects of historic or aesthetic significance." Id.

A Negative Declaration is inappropriate, and an EIR is required, "whenever it can be fairly argued" based on the evidence that a project MAY have a significant environmental impact. No Oil, v. City of Los Angeles (1974) 13 Cal.3d 68,85. If "presented with a fair argument that a project may have a significant effect on the environment, the lead agency SHALL prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect." Reg.15064(f)(1). No deference to the Staff's determination that an EIR is not required is appropriate. Sierra Club v. County of Sonoma (1992) 6 Cal.App.1307, 1318. An EIR is mandated even in those situations where the impacts are temporary, such as those caused by pile driving, truck hauling, etc., during construction. No Oil, Inc., supra.

Here an even higher standard applies requiring an EIR. In the MND it is conceded that there will be "potential significant effects" on the environment. MND p51. (Granted the Staff says it will attempt to mitigate them. Appellants show below they are not mitigated.)

Moreover, the mitigation measures agreed to by Rec. & Park relate only to attempts to mitigate impacts associated with the activities of actual construction of Project components and do not in any way mitigate the effects on the environment of the Project components themselves.

Because of these admitted potential effects, the Staff has the heavy burden of proving that "clearly no significant effects on the environment would occur." Reg. 15369.5 re Mitigated Negative Declaration standards. In preparing a MND instead of requiring an EIR, the Planning Department must determine that "proposals agreed to by the applicant would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur and there is no substantial evidence in light of the whole record before the agency that the project, as revised, may have a significant effect on the environment." Reg. 15064(f)(2). Said another way, the burden of proof NOT TO PREPARE AN EIR rests with the Planning Department. This "clear" standard is a very high standard to which CEQA binds the Planning Department and which has not been satisfied by the shallow MND. An EIR is required by law.

C. GROUNDS FOR APPEAL. AN EIR IS REQUIRED.

IMPACTS ON THE MARINA GREEN:

The MND does not adequately evaluate the environmental effects of the Project on the Marina Green. The Marina Green is identified in subconsultant Carey & Co's report as an historically significant resource, eligible for listing on the NRHP or CRHR, and designation as a City Landmark, and contributor to a potential West Harbor Cultural Landscape.

The ER application submitted to Planning by Rec & Park defines the Project Area as: "San Francisco Marina including East Harbor, West Harbor and Marina Green, Marina Blvd between Lyon St and Laguna St (Assessor's Block 900 Lot 3)." The Project Description states: "The Project includes waterside improvements in both harbors and related landside improvements adjacent to both harbors and along the Marina Green." The public Notice states: "The project site is located in the Marina District on the northern waterfront between Laguna and Lyon Streets north of Marina Blvd." (Independent 01/10/2004).

The official Notice of Project Receiving Environmental Review dated 02/07/2003, in the Project Description, defines the Project site as "Located north of Marina Blvd between Lyon and Laguna Streets on the northern waterfront of San Francisco, the Project Site (Block 900 Lot 3) includes approximately 34.5 acres of land area and about 39 acres of water area." THIS LAND AREA INCLUDES THE MARINA GREEN.

Yet the Planning Staff arbitrarily deleted the Marina Green, as well as the Fair's Seawall and the public promenade along the Seawall, from the Project site boundaries. In a Letter dated 09/26/2003 to their consultant Environmental Science Associates, who wrote the MND, Planning Staff directs the consultant to delete the Marina Green from the Project site boundaries, stating that "Limiting the Project site boundaries in such a manner would reduce the public perception that proposed improvements are more geographically extensive than they actually would be." This directive is in direct violation of CEQA which demands that effects on adjacent sites be evaluated.

The proposed Project represents a significant EXPANSION of the Harbor along the northern edge of the Marina Green by encroaching over 375' eastward from the existing easternmost berth along the Fair's Seawall, and enclosing about 150,000 sq. ft. of water area north of the Marina Green by the construction of massive breakerwater structures 350' long and 25.7' wide at MHT, a volume of 442,000 cubic feet of Bay fill, extending 8' above MHT and over 14' above MLLW. The physical impact and substantial negative aesthetic effect resulting from degradation and loss of public views of the open water from all affected points along the public promenade, the Marina Green, and the pedestrian path parallel to Marina Blvd have not been objectively evaluated. This needs more study.

The change of use of the degaussing station from abandoned building to Harbor Office space has not been evaluated as to its impacts on the public recreationists using the Green and the public promenade. The Office operates 24/7, not from 8:00 am to 5:00 pm as the MND implies. The effects of nighttime lighting and nighttime activity on the black crowned night heron and the killdeer which frequent the Marina Green have not been evaluated. (Note: When the US Navy built the degaussing station in 1951, the Special Use Permit granted by the City required the Navy to demolish the building when they no longer needed it, and return the spectacular site to Open Space. In 1998, Rec & Park allowed the Navy to walk away without fulfilling the terms of their Permit. The degaussing station is an obstruction on the public promenade. It blocks important views of the Bay from all points along the promenade and the Marina Green. The entire public record of the Rec & Park decision has been suppressed by the Department and not given to Planning Staff).

The effects of the construction of a new 18' tall warehouse building, the 600 sq.ft. expansion of an existing building, and the installation of shoreline trailer boat storage areas and an oily water holding tank have not been expressly evaluated. The MND makes no mention of the cumulative effects on the Green resulting from these significant changes which would effectively enclose, surround, and industrialize the Marina Green. These changes would

be incompatible with San Francisco Planning Code Sec. 101.1 Priority Planning Principle #8 which mandates "that our parks and open space and their access to sunlight and vistas be protected from development."

Moreover, the SF General Plan contains an additional mandate re the Marina Green: "Maintain the quality and character of the Marina Green." The Marina Green derives its quality and character from its unique location beside the open waters of San Francisco Bay, its natural and scenic setting, and its provision to the public of world class views of the Golden Gate Bridge, the Marin Headlands, Angel Island, Alcatraz, the East Bay Hills, Russian Hill, Pacific Heights, Crissy Field, the Marina District skyline. The Green at night offers the best viewing of the night sky and is a favorite of astronomers. The feeling of spaciousness and openness to sky and water is the defining characteristic of the Marina Green. Office space, warehouse space, trailered boat storage, oily water separators, recycling kiosks, massive new breakwaters in the open water, huge yacht superstructures blocking water views, - these components of the proposed Project are inconsistent with the General Plan mandate and detract from the quality of the Marina Green.

IMPACTS OF WEST HARBOR BREAKWATERS

The MND does not adequately address environmental effects of the proposed West Harbor breakwaters. The two breakwaters will significantly narrow the entrance to the West Harbor, thereby constricting tidal flushing action, which will result in lower water quality within the Harbor and shoreline area. Breakwaters will increase siltation at the Harbor entrance, thereby increasing the need for maintenance dredging over existing conditions. The breakwaters will cause siltation to occur in areas where siltation currently does not occur.

In whitewashing these issues, the MND relies solely on a numerical model based on the MIKE 21 finite difference model, developed by the Danish Hydraulic Institute and used to measure wave energy. (Technical Memorandum, Orion Environmental Assoc. 12/18/2003 p19.) The modeling was not circulated with the MND for public review and verification of the modeling by objective experts. The MIKE 21 modeling was performed by subcontractor Moffatt & Nichol, a sole source contractor with the City, who designed the Project. (It is interesting to note that the City contracted with M&N to design the Harbor without giving them a written scope - in violation of City contracting laws.) M&N are in the business of making money by designing and building marine projects, and they may be expected to bid on this Project.

Breakwaters are the single most costly item and inflate the cost of the renovation Project. "Expert opinion" offered by the designer of the Project based on a numerical modeling which they alone performed and which has not been circulated with the MND for independent expert verification, should be discounted. M&N has an inherent conflict of interest if they bid on the Project. As the designer of the Project and potential bidder on the Project, it is within their self-interest to minimize adverse environmental impacts of Project components.

The issues of erosion and surge deflection from the proposed breakwaters were inadequately addressed. It is well established in scientific literature that (placement of) breakwaters often have unintended consequences. For example, the breakwaters which were constructed at Pillar Point Harbor in Half Moon Bay had the unintended consequence of creating a change in the natural wave patterns and allowed the redirected wave energy to cause massive erosion on the cliffs that used to support Mirada Road. The wave energy, according to the experts who designed the project, was supposed to have been deflected back into the Bay. The unintended consequence was that it was deflected instead onto the adjacent shoreline. (Geologist Ken Lajoie, USGeological Survey, San Francisco Chronicle, 8/14/2001. Article attached.)

Surge deflected from the proposed West Harbor breakwaters might be deflected onto the Fair's Seawall, which is an important historical and cultural resource (Carey & Co. Historic Resource Evaluation Report, October 2003.) Along with the Marina Green, the Seawall is the defining characteristic of the Marina District. It is the place where land meets sea. The Fair's Seawall is known to be seismically unstable. Surge deflection from the new breakwaters could cause failure. This issue deserves careful study, in a full Environmental Impact Report.

SEISMIC IMPACTS.

Technical investigations post 1989 Loma Prieta earthquake have extensively characterized the soil conditions in the Project Area and have shown that the Marina Green and shoreline areas are subject to very violent shaking, ground amplification, liquefaction, lateral spreading, and vertical settlement. These reports have warned that the Fair's Seawall and Marina Blvd Seawall, which form the boundary of the West Harbor, will move 4 to 8 feet northward into the Bay in a major earthquake 8.3 in the SF Bay region. These reports include the following:

- 1) Report 90-253, Department of the Interior, US Geological Survey, April 20, 1990.
- 2) Final Report, Liquefaction Study, Marina District and Sullivan Marsh Area, San Francisco, CA, Harding Lawson Associates et al, July, 1991.
- 3) Board of Supervisors Marina District Liquefaction Task Force Report, Richard Evans DPW, Chair, May 1992.
- 4) Final Report, Geotechnical Investigation, Marina Blvd Seawall, Treadwell & Rollo, December 1997.
- 5) State of California, Seismic Hazard Zones, Official Map, November, 2000.

The proposed Project fails to address in any way the known structural defects of the Marina Blvd Seawall and the Fair's Seawall, which together form the southern boundary of the West Harbor and without which the West Harbor would not exist.

The State of California has determined that these Seawalls are in a Seismic Hazard Zone where earthquake mitigation measures are required. Further, the City & County of San Francisco in its Marina District Liquefaction Task Force Report, authorized by the Board of Supervisors and undertaken by the Department of Public Works finds that the Seawalls are in serious, immediate need of structural seismic retrofitting.

BACKGROUND

From the Report (90-253) of the US Geological Survey dated April 20, 1990, it appears these antiquated Seawalls were built long ago, before seismic construction standards were established. The first portion of the Fair's Seawall built around 1894 (but most of the fill behind it was placed after the 1906 earthquake) and the Marina Blvd Seawall was built about 1912, according to this Federal Report. Not surprisingly, this Report also has determined that the Seawalls are in an area subject to liquefaction and ground motion amplification, lateral spreading and vertical settlement during an earthquake. Since their construction, the Seawalls have not been retrofitted for a seismic event, - an earthquake.

The structurally inadequate Marina Blvd and Fair's Seawalls are an integral part of the West Harbor; they are what makes this Harbor a harbor. Without them, the area would be a marsh. Their failure in an earthquake would imperil the Harbor, the Marina homes across the street, and the City's Clean Water Program collection moat (box) which runs parallel to the Marina Blvd Seawall underground. Before any multi-million dollar Harbor Renovation Project is approved, the Seawalls must be included. No commercial lender would finance Harbor renovation if these Seawalls were not retrofitted as part of the project. Cal.Har.& Nav.C.Sec.71.4(b).

STATE AND CITY DETERMINATIONS

The State of California through its Department of Conservation, Division of Mines & Geology, has determined both the Marina Blvd Seawall and the Fair's Seawall are located in areas subject to liquefaction. In its Official Map of Seismic Hazard Zones for the City and County of San Francisco released November 17, 2000, the State mandates that since the Seawalls are in areas "where historic occurrences of liquefaction" have taken place, "mitigation" measures "consistent with established practices and that will reduce seismic risk" are "required." Cf. Seismic Hazard Map and Pub. Res.C.Sec.2693(c). "Cities and counties shall require, prior to approval of a project located in a seismic hazard zone, a geotechnical report." Sec.2697(a). This is specifically required of the City and County of San Francisco. Sec.2693(a). San Francisco Building Code Section 1804.5 similarly requires a seismic report before a project can proceed.

Following the 1989 Loma Prieta earthquake, the Board of Supervisors at the request of the Marina Civic Improvement & Property Owners Association established a task force to study seismic safety issues in the Marina District. This study was undertaken by the City's Department of Public Works with input from the US Geological Survey, UC Berkeley professor J. Mitchell, a leading geotechnical engineering expert, and other Blue Ribbon experts. This effort produced the "Marina District Liquefaction Task Force Report" in May, 1992. This Report recommended that certain safety measures be implemented and these measures were assigned priorities. The number one priority in the Report is the seismic retrofitting of the Marina Blvd Seawall and the number three priority is the retrofitting of the Fair's Seawall, to bring both into conformity with current seismic safety standards.

CONCLUSION

Before any approval of a Marina Harbor Renovation Project, there should be required conformance with State and City laws. The Marina Blvd and Fair's Seawalls should be retrofitted to current seismic safety standards as part of the Project. The application for State funding requires no less; the City must not only show it has conformed with the laws but also it must demonstrate to the State Department of Boating & Waterways both engineering and financial feasibility. Without retrofitting the Seawalls, the City cannot make such a showing. A full EIR is required for the Project to evaluate the serious seismic issues involved. The Marina Harbor Renovation Project is inconsistent with SF Planning Code Sec. 101.1(b) Priority Planning Principle No. 6: "that the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake." The MND has sidestepped the issues raised above and is therefore inadequate and incomplete.

VISUAL QUALITY.

The MND fails to address adequately the loss of views and the negative aesthetic impacts associated with placement of breakwaters along the public shoreline in the West Harbor. The MND states that "...existing panoramic views from other locations along the seawall, public walkways, and from the Marina Green would continue to be available under Project conditions." This is a remarkable statement and is totally unsupported by any evidence.

The size of the proposed West Harbor breakwaters is massive. They are 350 feet long, 25.7 feet wide at Mean High Tide, rising 8 feet above the water at MHT and 14-15 feet above the water at MLLW (low tide). The volume of fill is estimated at 432,000 cubic feet below MHT. The volume of the breakwaters above MHT is not stated. Remarkably, the MND concludes that these massive structures would not have a demonstrable negative aesthetic effect and would not degrade or obstruct scenic views or vistas now observed from public areas along the shoreline. Yet there is no factual evidence to support this conclusion. There is no mock-up model, no computer generated graphics, no photos of existing views with overlays of the proposed two breakwaters to show the area with the built project, upon which the Planning Department has based this conclusion.

Moreover, the Planning Department does not address the issue of the 150,000 sq.ft. of water area lying between the Outer Jetty (St. Francis Spit) and the Fair's Seawall that will be surrounded and enclosed by the new West Harbor breakwaters and filled in with facilities to berth 45 foot to 60 foot yachts with superstructures rising perhaps 20 to 30 feet high or masts perhaps 80 feet high, and the resultant loss and degradation of views now available to the public from the shoreline and adjacent Marina Green. The attached photos of the project location show there will be a substantially negative visual impact associated with the Project.

Not only is the conclusion that massive breakwaters and berthing facilities for 60 foot yachts placed in the open waters north of the Marina Green will not have a demonstrable negative aesthetic effect and will not degrade public views unsupported, but this key component of the SF Marina Renovation Project is inconsistent with Board of Supervisors Resolution No.450-94, passed unanimously in May 1994, which established City policy on the issue of West Harbor breakwaters: "Resolved, that the Board of Supervisors of the City and County of San Francisco urges the Mayor to oppose the construction of any additional breakwater in the Outer West Harbor." THIS LEGISLATION REMAINS CITY POLICY.

SIGNIFICANT INCREASE IN LINEAR FOOTAGE OF DOCKS.

The MND does not address the environmental effects of the significant expansion of the Harbor represented by the addition of 3,335 linear feet of docks over existing conditions. This is the length of over eleven football fields. The MND does not address the significant increase in Bay fill, as defined by BCDC, that these additional docks represent. (BCDC defines "fill" as the placement of any material in or over the water surface at Mean High Tide.)

According to Moffatt & Nichol Engineers, Job No. 4857, "San Francisco Marina - Existing Layout 1997", which is the baseline count for the Renovation Project, the linear footage of existing docks is 21,280LF. According to "Bureau of Engineering Department of Public Works, San Francisco Marina Proposed Layout - Plan January 29, 2002," the proposed layout is 24,615LF.

(It should be noted that this document contains an internal inconsistency between the layout shown and the total berth count shown. The berth count apparently fails to include 440LF which are the four 110' berths leased to the St. Francis Yacht Club. Additionally, the berth count for the West Harbor lists thirty-four 30' berths, whereas the layout show thirty-nine 30' berths, or an additional 150LF. Therefore, we have added 440LF + 150LF (or 590LF) to the total berth count shown on the DPW document.)

Thus the proposed Project adds 3,335 linear feet of berths to the existing 21,280 linear feet, an increase of 15.67%. The MND does not mention this, and failed to address the impacts. The Project Description states that the Project is a renovation of the Harbor. This is factually incorrect and stating the Project Description in this way can only be interpreted as an attempt to deceive the decision-makers who will pass judgment on this Project and to deceive the public into thinking the Project is less than significant.

The Project is a major expansion of the Harbor, and a further encroachment of Harbor facilities on the public shoreline open space. This should be addressed in an EIR.

SOCIO-ECONOMIC IMPACTS.

The proposed Project removes and does not replace 41 berths for 20' boats and 208 berths for 25' boats. This would leave only 16 berths in the entire rebuilt Harbor for small boats. Additionally, the Project removes and does not replace 33 berths for 30' boats. These 282 berths that would not be replaced account for over 40% of the existing berths in the Harbor.

On the other hand, there will be a significant increase in berths for 35' boats up to 90' boats. Overall, the number of berths will decrease from 686 to 623; however, 3,335 linear feet of docks will be added to the Harbor over existing conditions in order to accommodate the significant increase in the number of bigger boats.

This issue has not been evaluated in the MND. Deleting smaller berths and adding berths for bigger, significantly more expensive yachts is discriminatory and eliminates existing inventory for the less affluent members of the public. It violates the mandate of the Recreation & Park Department, viz., to make the public facilities under its care and management open to the widest segment of the public possible, at reasonable and affordable rates. Moreover, the 25' sailboat is the standard on the Bay and according to the California Department of Boating & Waterways, demand for berths for 20' to 25' boats will increase in the Bay region, but the demand for larger boats will decrease. (California Boating Facilities Needs Assessment, Oct 15, 2002 Table 6 "Forecasts of Boats by Type & Region.")

CROA Reg. 15064(e) states: "Economic or social changes may be used ... to determine that a physical change shall be regarded as a significant effect on the environment." "Economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant." Id. Limiting access to public berthing facilities to only those who can afford bigger boats is a socio-economic impact that is a direct effect of eliminating small berths. The socio-economic impacts resulting from this physical change in berth size and distribution should be regarded as a significant effect on the environment and require an EIR.

IMPACTS OF INCREASED PERCENTAGE OF POWER BOATS OVER SAILBOATS.

The MND does not evaluate the impacts associated with the expected increase in the percentage of power boats over sailboats which will occur as a result of the proposed changes in berth size. It can reasonably be inferred from Project components that the number of noisy, air-polluting, water-contaminating power boats will significantly increase and the number of low-impact sailboats will significantly decrease over present conditions.

This can be inferred from 1) the significant decrease in the number of small boat berths, eliminating 249 out of 265 existing small berths, and the significant increase in the number of large boat berths; small berths tend to be occupied by sailboats and large berths by power yachts; 2) the installation of oily water separators, which almost exclusively are for the convenience of cleaning out the engine compartments of large power boats; and 3) the 30 amps power to be installed at each berth; small sailboats have no need of 30 amps power.

The Planning Department needs to document existing percentages of power boats and sailboats in order to establish a baseline, in order to evaluate the impacts of more and larger power boats. These impacts may include more noise, more pollution, more risk of fuel spills and, because of the east-west layout proposed for the Outer West Harbor north of the Marina Green, the obstruction of public views of the Bay by their enormous superstructures.

TRAILERED BOAT STORAGE.

The Environmental Review Application, Project Summary Table 1, lists a proposed facility for "trailer boat storage" in the East Harbor. The Planning Department "Notice of Project Receiving Environmental Review" lists a "trailer boat storage area." This issue is not addressed in the MND. The physical location and square footage of this storage area are not identified. The number of boats, the size of these boats, and the number of automobile parking spaces that would be taken for this storage area are not identified.

Adverse effects of boats stored on trailers along the public shoreline open space, blocking and degrading public views of the Bay and park must be evaluated. Effects on traffic circulation and parking must be considered, as well as the effects on recreationists using the Marina Green, East Green, and promenade. Access to open space and alteration of visual quality must be evaluated. The substantial negative aesthetic effect on the Marina Green could not be mitigated.

RENOVATED BOAT HOIST FOR TRAILER BOAT LAUNCHING.

The existing boat hoist has not been in operation for many years. It is located immediately adjacent to the Main Entrance to Lower Fort Mason, through which millions of cars and trucks pass annually. A significant increase in passenger vehicles is expected with the opening of the new Fort Mason Pier 1 facility. The 28 MUNI Line uses this entrance, as well as thousands of tour buses annually. It is also the main pedestrian entrance to Lower Fort Mason.

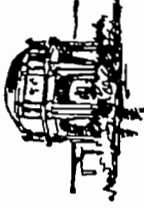
Vehicles pulling trailered boats from the as yet not defined East Harbor trailered boat storage area, combined with those vehicles pulling trailered boats and originating from locations outside the Marina, queuing for use of the proposed new boat hoist will result in severe overcrowding at the Fort Mason entrance, particularly on weekends. In addition, the public dock, the public hand boat launching area, the oil recycling kiosk, the yacht sales office, and the proposed MUNI F-Line extension to Fort Mason will all contribute substantially to further overcrowding in this immediate area. These cumulative impacts must be assessed in an EIR.

It is important to note that the Recreation & Park Commission has not approved the proposed Project, only the Project "concept." It is also important to note that although the Board of Supervisors has given authorization to the Recreation & Park Department to submit an application to the California Department of Boating & Waterways for a loan in the amount of \$38,800,000 for a Marina renovation, the Board has expressly NOT given its approval for this Project and has expressly NOT permitted this Project (BOS Resolution 149-03 File No. 0301330.) Since an Environmental Impact Report is simply a decision-making tool for the decision-makers, and since they have expressly withheld their decision about the proposed Project, there is every reason to provide more information to them by identification and evaluation of alternatives to this Project in a full EIR.

CONCLUSION: As we have shown in this Letter, there is substantial evidence which supports a fair argument that the proposed Marina Renovation Project may have a significant effect on the environment. We request that an Environmental Impact Report be prepared.

Sincerely,

Joan Marie Girardot
Joan Marie Girardot
Secretary



Marina Civic Improvement & Property Owners Association
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Name (print): JOHN J. CROWLEY

Address: 603 MARINA BLVD, SAN FRANCISCO

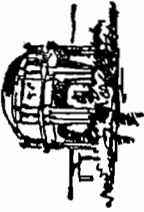
Phone: 776-6133

Fax: _____

Email: _____

Signed: John J. Crowley

Dated: February 6, 2004

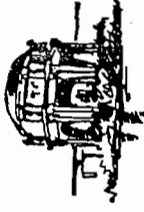


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Name (print): JOAN MARIE GIRARDOT
 Address: 349 MARINA BLVD SF 94123-1213
 Phone: 346-5525
 Fax: 665-1808
 Email: _____
 Signed: Joan Marie Girardot
 Dated: February 9, 2004

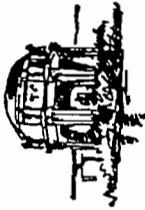


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Name (print): RONALD J. MULLARE
 Address: 655 MARINA BLVD, SAN FRANCISCO, CA 94112
 Phone: 415 567 8119
 Fax: _____
 Email: _____
 Signed: [Signature]
 Dated: February 8, 2004

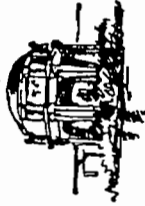


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Name (print): Marc F. Goldyne
 Address: 221 Marina Blvd. S.F. 94143
 Phone: 415-929-9121
 Fax: 415-929-9155
 Email: mgdyne@aol.com
 Signed: Marc F. Goldyne MD
 Dated: 01/29/04

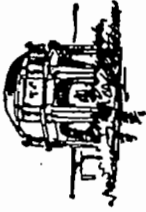


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Name (print): GAIL GOLDYNE
 Address: 221 MARINA BLVD. - SF 94123
 Phone: 929 9121
 Fax: 929 9155
 Email: GailGold@aol.com
 Signed: Gail Goldyne
 Dated: Jan. 29, 2004

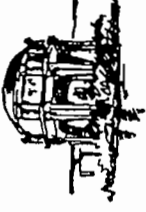


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Name (print): ALAN SILVERMAN
 Address: 185 MARINA BLVD. SAN FRANCISCO CA 941
 Phone: 415-346-4164
 Fax: 415-346-4184
 Email: SILVETAL @ AOL. COM
 Signed: Alan Silverman
 Dated: 2/7/04

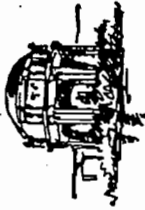


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Name (print): PAUL S. SATHANAWAL
 Address: 255 MARINA BLVD SF CA 94125
 Phone: 415-999-0484
 Fax: _____
 Email: _____
 Signed: Paul S. Sathawan
 Dated: 2/6/04

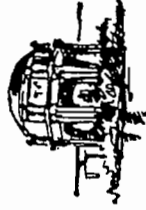


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Name (print): CARINA T. SABHARWAL
 Address: 255 Marina Blvd, SF 94123
 Phone: 415-929-0484
 Fax: _____
 Email: _____
 Signed: Carina Sabharwal
 Dated: 2/6/04

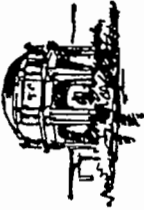


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Name (print): MICHAEL J. NICHOLS
 Address: 265 MARINA BLVD., SAN FRANCISCO, CA 94123
 Phone: 415-749-1136
 Fax: 415-749-1131
 Email: MNICHOLS50@HOTMAIL.COM
 Signed: M Nichols
 Dated: Feb 8, 2004

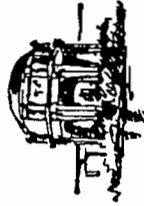


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Name (print): Nancy Nichols
 Address: 265 MARINA BLVD, SAN FRANCISCO, CA 94123
 Phone: 415 - 749 - 1136
 Fax: 415 - 749 - 1131
 Email: MANNICHTS50@HOTMAIL.COM
 Signed: Nancy J. Nichols
 Dated: Feb. 8, 2004

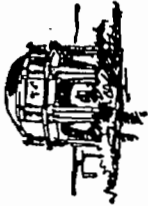


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Name (print): Sheela Simon
 Address: 301 MARINA BLVD.
 Phone: 415 929 9197
 Fax: _____
 Email: Sheela.Simon@Spec.Global.net
 Signed: Sheela Simon
 Dated: Feb. 8 '04

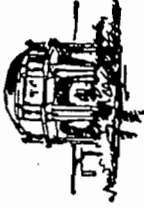


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Name (print) : Betty White
 Address: 3250 Laguna St #105, S.F. CA 94123-2939
 Phone: 415-346-1737
 Fax: 415-346-1773
 Email: _____
 Signed: Betty White
 Dated: 02/06/04

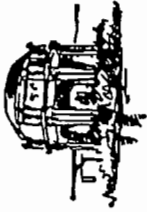


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Name (print) : Donald Russell
 Address: 235 Marina Blvd. San Francisco, CA
 Phone: 415-931-4904
 Fax: 415-931-1852
 Email: elcrsfo@worldnet.att.net
 Signed: DRussell
 Dated: Jan 30, 2004

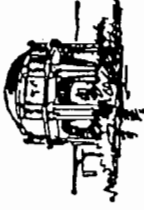


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Name (print): Lee Ellen Russell
 Address: 235 Marina Blvd S.F. CA 94123
 Phone: 415-931-4904
 Fax: 415-931-1852
 Email: lee-elf@worldnet.att.net
 Signed: Lee Ellen Russell
 Dated: Jan 30, 2004

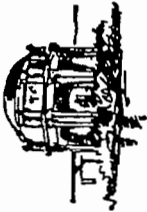


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Name (print): Sue Chang
 Address: 55 Casa Way, Apt 201
 Phone: 415-440-7746
 Fax: _____
 Email: suechangsf@sbcglobal.net
 Signed: Sue Chang
 Dated: February 6, 2004

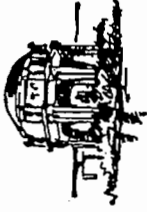


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Name (print): LINDA S. CUENCO
 Address: 2265 BEACH ST #1
 Phone: 415 931 0331
 Fax: _____
 Email: _____
 Signed: Linda S. Cuenco
 Dated: 2/7/04

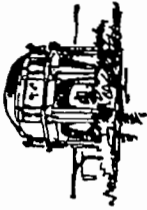


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Name (print): Irving ZABETSKY
 Address: 3111 Jackson Street #5
 Phone: 922-7609
 Fax: 931-8509
 Email: _____
 Signed: [Signature]
 Dated: 1/29/04

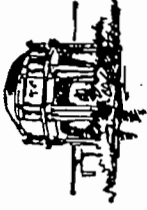


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Name (print): EMERIC KALMAN
Address: 211 GRANVILLE WAY, S.F., CA 94127
Phone: (415) 665-5777
Fax: Call for Fax
Email: _____
Signed: Emeric Kalman
Dated: February 2, 2004

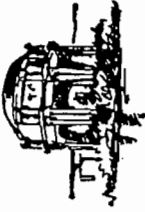


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Name (print): Joel Ventresca
Address: 1278 - 44TH AVE., San Francisco, CA 94122
Phone: (415) 731-1434
Fax: (415) 753-3877
Email: ventrescaj@aol.com
Signed: Joel Ventresca
Dated: Feb. 8, 2004

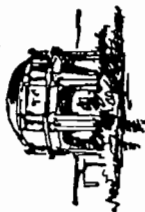


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The individual named below has pledged and/or contributed \$20.00 toward the cost of an appeal to the SF Planning Commission, and an appeal to the SF Board of Supervisors if necessary, of the preliminary negative declaration for the proposed San Francisco Marina Renovation Project, and wishes to join in ~~the~~^{that} have his/her name listed on the appeal to the SF Planning Commission.

Name (print): MICHAEL I SPIEGEL
 Address: 181 MARINA B'LDG
 Phone: 922 5716
 Fax: 921 0523
 Email: MIS181@pacbell.net
 Signed: *Michael Spiegel*
 Dated: Feb. 8, 2004

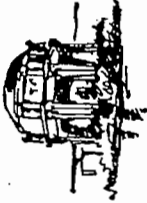


Marina Civic Improvement & Property Owners Association
 P.O. Box 470790 • Marina Station • San Francisco, CA 94147-0790

JOINER IN APPEAL OF PRELIMINARY NEGATIVE DECLARATION FOR
 PROPOSED SAN FRANCISCO MARINA RENOVATION PROJECT

The individual named below has pledged and/or contributed \$20.00 toward the cost of an appeal to the SF Planning Commission, and an appeal to the SF Board of Supervisors if necessary, of the preliminary negative declaration for the proposed San Francisco Marina Renovation Project, and wishes to join in ~~the~~^{that} have his/her name listed on the appeal to the SF Planning Commission.

Name (print): Colin Fontanello
 Address: 1435 Bay St - SF 9423
 Phone: 415-771-8662
 Fax: _____
 Email: _____
 Signed: *Colin Fontanello*
 Dated: 2/8/04



RECEIVED

APR 25 2005

CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

Marina Civic Improvement & Property Owners Association
P.O. Box 470790 • Marina Station • San Francisco, CA 94147-0790

April 22, 2005

Mr. Paul Maltzer
SF Planning Department
1660 Mission Street Suite 500
San Francisco, CA 94103-2414

Re: Notice of Preparation/Initial Study
Dated March 19, 2005
Case No. 2002.1129E

Dear Mr. Maltzer,

This letter submits comments on behalf of Marina Civic Improvement & Property Owners Association and on behalf of the individual appellants listed in our Appeal of the PMND for this project. Thank you for the comment period extension.

For your information, there has been no Notice of the NOP posted at the project site. (April 17, 2005)

Since an EIR is an informational document prepared for decisionmakers, it is vitally important that the project Description and Purpose be set forth in straightforward, clear language, designed to inform and not to mislead, and that all the information presented is accurate.

Project Description

The project description is technically inaccurate and it is misleading. According to the Department of Building Inspection the term "renovation" is a technically meaningless term and can mean almost anything the applicant defines it to mean. The term does not appear in any of the City's codes.

Technically, the actual project is a demolition (removal) and new construction project: removal of all existing in-water berthing facilities including all piles, docks, fingers, gates, gangways, utilities, etc and replacement construction of all the aforesaid, constructed of different material and with a different berth size distribution and layout.

2.7

-2-

The project description is further inaccurate because it omits the vital information that the project is an expansion of Harbor facilities. The project adds 3,335 linear feet of docks in addition to the replacement of 21,280 linear feet of existing docks (Mofatt & Nichol 1997), for a total linear footage of 24,615 LF. This addition of 3,335 LF represents a length greater than 11 football fields and represents a significant increase in Bay fill over existing conditions.

The project description is further inaccurate because it omits the vital information that the construction and the placement of the proposed Outer West Harbor breakwaters will enclose over 150,000 square feet of surface water area, which is now open water, and that the placement of the additional Outer West Harbor berths will encroach over 375 feet eastward from the existing easternmost berth along the Fair's Seawall. This represents a significant expansion of the Harbor along the public shoreline. It greatly expands the footprint of the Harbor.

The project description is further inaccurate and misleading because it merely refers to "reconfiguration of the floating docks and slips," but does not explicitly state the very significant information that the proposed "reconfiguration" calls for permanent removal of an existing 282 berths for small boats. These 282 berths represent over 40% of the existing berths in the Harbor. This physical change to the environment (the elimination of berths for small boats) will have a significant social and economic impact on the public. Only persons of more substantial means can afford the larger boats. Citizens of more limited financial means, who can only afford a small boat, will be excluded from access to the berthing facilities at this public harbor.

In sum, this is not a renovation project. It is not a repair and replacement project. It is a demolition, new construction and expansion project, with elimination of berths for small boats.

Project Purpose

The project purpose states: "many of the docks and associated utilities have become unsafe for marina tenants.." If these docks are unsafe, CAL OSHA should be notified immediately and the facility shut down. Obviously, your characterization of the docks as being "unsafe" is not technically accurate. Floating docks without railings are inherently "unsafe," and there is no way to make a floating, moving dock "safe."

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cont

The purpose statement asserts that the renovation purpose is "to provide a safer, more up-to-date marina with a longer useful life and a slip size distribution that more closely matches market demand."

The proposed project does not achieve the stated project purpose. The proposed project slip size distribution with removal of 282 berths for 20, 25 and 30 foot boats contradicts the purpose of achieving "a slip size distribution that more closely matches market demand." The official forecasting of berthing facilities needs on San Francisco Bay contained in the DBW California Boating Facilities Needs Assessment dated October 15, 2002 states that demand projections for the period 2000-2020 will go up for the smaller 20' and 25' boats but the demand for berths over 25' in length will fall. Therefore, the project's proposed slip distribution would fail to meet the projected market demand. According to these DBW forecasts, the number of berths for small boats (25' and under) should be increased and the number of berths for boats larger than 25' in length should be decreased.

Further, the stated project purpose of providing a "safer, more up-to-date marina with a longer useful life" can be achieved through a program of repair and replacements (as needed) to the existing berthing facilities and existing berth layout, without ripping everything out and installing everything new. A "repair and replacement" project can achieve the basic project purpose without the demolition, removal, new construction and expansion project that is being proposed. Furthermore, a repair and replacement project can be done at far less cost and without significant effects on the environment. (A 10-Year San Francisco Marina Redesign Program Initial Study was done in 1999 Case No. 98.834E).

Initial Study

We strongly object to your decisions to drop issues raised in the public scoping and in the Appeals of the PMND from further consideration in the EIR. We assert that all of the issues raised should be carried forward and addressed in the EIR. In light of the whole public record which you have before you, your additional review of the issues raised is warranted and we urge you to reconsider. Your "checklist" and "discussion" in the Initial Study do not explain in sufficient detail and

2.3

11.1 specificity the reasons for determining that certain potentially significant effects of the project will not be significant and can therefore be dropped from consideration in the EIR. The analysis in the IS is insufficient and the conclusions arbitrary, and we therefore ask that you again evaluate the issues you have decided to drop. Your conclusions are not supported by the substantial evidence in the record, and in some instances are actually based on false information, presumably given to you by the project sponsor.

3.6

For the Initial Study to assert that the reuse of a military structure, which has been vacant for decades and which never had public access, as a facility to house administrative office space is not a change in land use is preposterous. To assert that the pilings in the harbor are 40 years old, when a large percentage of them were replaced with FEMA money after the 1989 earthquake, is simply false. To simply state that seismic retrofit of the existing seawalls is not part of the project and therefore no evaluation is required defies Prop M which requires as a priority planning principle that any construction project achieve the greatest possible preparation for earthquake

11.2

To assert that introduction of exterior lighting at the degaussing station will have no effect, when there is at the present time no exterior lighting, and that an office use will have no impact on the existing character of the vicinity is ludicrous. To state that the pilings support the floating docks is inaccurate; pilings do not support docks, they merely anchor them. The IS makes no mention of the material the replacement docks will be made of; therefore, how can you evaluate it. You do not provide a traffic study. A traffic study is necessary, because the project components in the East Harbor create the classic CEQA case of "overcrowding" at the entrance to Ft. Mason. An analysis of increased consumption of electricity is omitted. Providing 30 amps to 628 berths (each) is a huge increase over present consumption. The IS does not evaluate the alternative of putting concrete or stainless steel "sleeves" on the pilings which are salvageable instead of removing them and replacing with new pilings, which have serious environmental effects because of the PAH's.

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There are so many omissions and misstatements of fact in the Initial Study, we would suggest you send a request to Mr. Gross to sign a statement attesting to the accuracy of all the information he has submitted to MEA.

Alternatives

Although the Initial Study makes brief mention of examining alternatives, it is extremely vague as to which alternatives will be examined in the EIR. CEQA is quite clear about the need for a range of alternatives to be examined in an EIR.

PRC Sec. 21002.1(a). "The purpose of an EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

CEQA reggs Sec.15126.6(a) "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives... The lead agency is responsible for selecting a range of alternatives for examination and must publicly disclose its reasoning for selecting those alternatives."

Please include in the EIR the following alternative as a specific alternative to be assessed:

Do the necessary dredging and sand mining. Repair and make replacements as needed to the existing facilities with the existing layout and the existing berth size distribution. Put concrete or stainless steel sleeves on salvageable piles as an alternative to removal of those piles. Demolish the degaussing station and restore the site to open space (as provided and promised in the original conditional use permit issued by the City to the USNavy). Do not construct a maintenance building on the East Green, but continue to rely on the Structural Maintenance Division facility in GG Park. Leave the historic Scott Street moles intact. Do not build breakwaters north of the Marina Green. Remove and do not replace the berths in the Outer West Harbor. Construct a breakwater in the East Harbor, pending environmental and engineering review. Do not create trailered boat storage space on the public shoreline. Do not install paid parking. Seismically retrofit the Marina Blvd and Fair's Seawalls.

10.1

Thank you for the opportunity to offer comments.

Joan Girardot
Joan Girardot
Secretary

October 14, 2005

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Mr. Maltzer,

On October 5, 2005, the Landmarks Preservation Advisory Board (Board) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the San Francisco Marina Renovation Project. After discussion, the Board arrived at the following comments:

- The Cultural Resource Evaluation Report dated December 2004, did not evaluate the residential buildings of the Marina District neighborhood for their potential as a historic resources with architectural and historical significance. The Board felt that due to the fact that the Marina District neighborhood (roughly bounded by Marina Blvd, Fillmore, Chestnut and Scott Streets) development began after soon after the 1915 Panama-Pacific International Exposition, a time of vast development in the area, that these houses should be evaluated collectively under the context of residential neighborhood development as a potential historic district

5.11

The Board appreciates the opportunity to participate in review of this environmental document.

Sincerely,

M. Bridget Maley, President
Landmarks Preservation Advisory Board

City & County of S.F.
Dept. of City Planning

OCT 21 2005

OFFICE OF
ENVIRONMENTAL REVIEW

1615 GREENWICH ST
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October 17, 2005

Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission St. Suite 500
San Francisco CA 94103

RE: SF Marina Renovation Project, Planning Case No. 2002.1129E, State Clearinghouse #2003122131


Dear Mr. Maltzer,

Thank you for your efforts to improve the Marina. These public improvements are often a case of "no good deed goes unpunished" so your work on the public's behalf is much appreciated. I have three comments on the EIR:

- 1. The location of the maintenance facility will present a significant, and easily avoided impact to the open space by the East Harbor. Right now the plan proposes to set it out there well into the open space, like the monolith in 2001 Space Odyssey. Simply moving this building north or east to the edge of the open space, closer to the bathrooms, even integrated into that building, would be better. 3.2
- 2. No commercialization of the existing uses should be part of this project. Cruise ships, and the like, embarking or disembarking here would obviously have many significant, unavoidable impacts not studied in the EIR. 3.1
- 3. While it may or may not be a part of this project, the pedestrian access from Fort Mason to the East Harbor is awful and at level of service F. The tunnel from Fort Mason has a wall which encroaches and necks the sidewalk down to an unusable state. One stroller blocks the entire width. This access is much used by cyclists (who should be in the street), joggers, walkers, and kids, and many times people are forced out into the street, which is very narrow and has ZERO shoulder. It's dangerous, and an unnecessary inconvenience. I have witnessed several alterations over right-of-way there myself. I would rate it a higher priority than any improvement in this EIR, and to the extent that this project will exacerbate the situation, one that should be improved as part of this project. 9.3

Thank you.

Very Truly Yours,


Brian W. Veit

Nathaniel Berkowitz
47 Bulkeley Av
Sausalito CA 94965

Tel 415 331 3314 fax 415 331 1854 nathanielb@yahoo.com

October 18, 2005

Paul Maltzer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco CA 94103
Fax 415 558 5991

Subject: Case No. 2002.1129E Marina Renovation

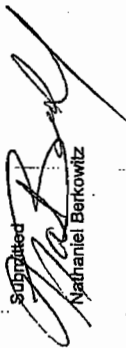
The scope of the proposed Environmental Impact Study was offered for comments by your document dated March 19, 2005.

Howbeit, inasmuch as the document was seriously flawed based on "Initial Study of the San Francisco Marina Renovation", I am offering the following items for consideration since they affect conclusions of the EIR, and of course the overall resulting design(s). It is my understanding that the immediate attention is being given to the West Harbor and comments below are clearly orientated to that conclusion. The East Harbor complexities may require alternatives that would separate it functionally from the West Harbor and should be addressed by a joint GGNRA study.

- 1. Relocate the Wave Organ: Moving the wave organ jetty from a North Easterly to a South Easterly orientation. Changing the Wave Organ Jetty will reduce the sedimentation within the Harbor and will eliminate the need for building a new Breakwater to the North. A breakwater from the South may not be required or it may be a less obtrusive structure. 2.10
- 2. Extend the West Basin to the existing Western Harbor Wall i.e. move the North-South float approximately one hundred feet to the West. Utilizing the West portion of the basin will allow more berths along both sides and providing greater turning water at the "head of the harbor".
- 3. Coordinate with GGNRA the Crissy Field Marsh & Wetland Project, and extend their lagoon system with canals that would connect to the Western portion of the Marina. This would improve the flushing rates of water in the West end of the basin. If connecting to Crissy Field Lagoons is not available then an exit channel/tunnel should be constructed. The poor flushing within the West Basin must be improved. The studies by Moffat & Nichol were models and require verification. 6.10
- 4. Relocation of the Degaussing Station from its present site to an alternative one would be a view improvement for all and its use as a Harbor Office seems a needless expansion of facilities. 10.3

- 5. A public restroom for the Marina Green is needed but not at the entrance to the Harbor. Perhaps the DeGaussing Station could be used for Public Restrooms and located at a screened site. To the West of its present location. 2.5
- 6. Maintain the existing PUC Building as a maintenance facility and arrange the transfer to Park and Recreation. 2.11
- 7. The historic lighthouse that once marked the entrance to the Harbor should be relocated to the new entrance (further to the East) and hopefully on the relocated spit (see item 1.) 2.12
- 8. Public docks and pump-out sewage station should be maintained and be accessible. 2.13
- 9. The distribution of berths seems appropriate and it must be recognized that the existing harbor was built "too small" and was controversial at that time. Perpetuating that distribution would be in error. However, the West Harbor is and should be principally Sailboats and the ability to sail into the Harbor must be preserved.

I have made many of the recommendations over the years and look forward to Restoration of the San Francisco Marina.

Submitted

 Nathaniel Berkowitz

October 18, 2005.

Paul Maltzer
 Environmental Review Officer San
 Francisco Planning Department
 1660 Mission Street Suite 500
 San Francisco, CA 94103

Civ. & County of S.F.
 Dept. of City Planning

OCT 25 2005

OFFICE OF
 ENVIRONMENTAL
 REVIEW

Dear Mr. Maltzer,

I am writing to comment on the Draft EIR for the San Francisco Marina Renovation Project.

I am a frequent user of the marina as a sailboat owner berthed in Sausalito, an employee of an organization located in Ft. Mason, and a daily bicycle commuter along the marina waterfront. Additionally, while no longer a resident of the Marina District I lived there from 1969 through 1991.

First and foremost, I strongly support the general plan to renovate the Marina into a modern facility. I am especially supportive of the plans to provide the public with a hand launch site in the East Harbor, and plans to modernize the ramps and gates to make them accessible.

However, I believe that the Draft EIR does not adequately address concerns with the Visual and Aesthetic Resources.

Specifically, In Figure 8, showing proposed Views from Viewpoint Location 4, all of the boats pictured are low profile sailboats. Unless there are guarantees that no powerboats, which can have side profiles 4 - 5 times the height of similar length sailboats, will be berthed in this area this photo is misleading and can not be used as a legitimate example of the proposed view.

Secondly, I am extremely concerned about the existence of at least two visible "side" or "end" ties in this photo which are shown as unoccupied. My experience with other harbors is that these end ties are often used for the mooring of mega yachts exceeding 100 feet in length and up to 30 feet high. At this time, examples of this are the two mega yachts "Romin" and "Invader" currently side tied at Schoonmaker Marina in Sausalito. Even if these types of docks are classified as "Guest Docks", unless there are going to specifically stated and enforced prohibitions against the use of these side ties for such boats this photo is again inaccurately misleading and cannot be used as a valid example of the proposed views.

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Pacific Gas and Electric Company

WE DELIVER ENERGY.

City & County of S.F.
Dept. of City Planning

OCT 21 2005

OFFICE OF
ENVIRONMENTAL REVIEW¹

October 19, 2005

Greg Milano
308 B Third St.
Sausalito, CA 94965

Mr. Paul Maltzer
Ms. Lisa Gibson
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Unfortunately, it is hard to accept that the inaccuracy of this photo is inadvertent, and easier to conclude that it represents a conscious effort to mislead the public about the true impact that increased slip sizes will have on views of San Francisco Bay from the waterfront.

Again, I am firmly in support of the Marin Renovation, but would like to see assurances that these slips will not be used for the berthing of multi million dollar mega yachts that obstruct the general public's ability to enjoy the magnificent views currently available.

Robert C. Dess, P.E.
Principal
Site Remediation
Environmental Support
and Services

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**Re: San Francisco Marina Renovation Project – Draft Environmental Impact Report
San Francisco Planning Department Case No. 2002.1129E**

Dear Mr. Maltzer and Ms. Gibson:

These comments on the Draft Environmental Impact Report ("DEIR") for the San Francisco Marina Renovation Project, SF Planning Department Case No. 2002.1129E, are submitted on behalf of Pacific Gas & Electric Company ("PG&E"). PG&E objects to portions of the DEIR for this project, and believes that the City must require revisions as set forth below before the project should be approved.

L. The DEIR contains insufficient information to support the stated approach to and estimated costs for the proposed East Harbor dredging.

The DEIR proposes that approximately 17,500 cubic yards of sediment in the East Harbor¹ containing more than 5 mg/kg of polycyclic aromatic hydrocarbons (PAH) will require upland disposal after dredging. Not only is the basis for determination of the volume insufficient to reasonably estimate the scope and cost of the proposed work, but critical issues related to the safe dredging, handling, treatment, and transport of the sediments are not addressed in the DEIR. Several fundamental aspects of the proposed dredging project should be more carefully considered, including the following:

- 1) The basis for the estimated volume of sediments requiring upland disposal is not sufficiently delineated.
- 2) The DEIR presents an unrealistically simplistic picture of the dredging, handling, treatment, and transport necessary for the proposed action. In the event that

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¹ All references to "harbor" in these comments are to the East Harbor.

dredging of the sediments containing greater than 5 mg/kg PAH is performed, stringent measures will be needed to protect water quality during dredging and to ensure resuspension and dispersal of sediments does not result in recontamination of other areas of the East Harbor or San Francisco Bay.

3) The DEIR lacks any clear articulation of plans for management of the dredged material after removal. In addition to requiring methods to protect water quality and to reduce the likelihood of recontamination, the handling, treatment and transport of the sediments will likely involve dewatering and possibly the addition of stabilizing and solidifying agents prior to transport to an approved upland disposal facility. The cost of these potentially necessary treatment steps, as well as the possible impacts on the final disposal volumes, is not addressed in the DEIR. Moreover, the DEIR does not address the possible need for treatment and disposal of contaminated water associated with dredging and treatment of the sediments.

4) The DEIR does not sufficiently address the potential for air quality impact at point of dredging and at any locations where handling and treatment of the dredged sediment would be performed. Sediments containing the stated concentrations of PAH may, when dredged, handled, treated, and transported, produce airborne emissions that represent potentially harmful concentrations of chemicals. Methods for mitigation of such possible impacts should be stated and the impact on project cost and schedule should be considered.

5) The costs associated with the proposed dredging and disposal cannot be reasonably estimated at this time, due primarily to the high degree of uncertainty surrounding the volume of sediments possibly requiring upland disposal and the measures potentially necessary for adequate environmental and human health protection. The possible changes in volume and protection requirements could dramatically increase the cost of construction and should be more carefully considered at the DEIR stage.

II. Capping of East Harbor sediment after dredging is not necessary

The DEIR proposes the dredging of sediment in the main harbor to a depth of 9 feet and in the channel to a depth of 13 feet to accommodate a one-foot cap of 'clean' sand over the remaining East Harbor sediment. The desired effective depths of the main harbor and channel for boat use are 8 and 12 feet, respectively. As proposed, this cap, especially in the main harbor portion of the harbor, is not necessary for a variety of reasons:

1) The main harbor sediment is presently capped with a one foot layer of natural 'clean' sediment at the 8 to 9 foot depth. It is evident from the ADL study (Arthur D. Little, 2000) that almost all the harbor sediment has natural silt/clay sediment with low concentrations of PAHs (<5 mg/kg total PAH) at the depth of

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8 to 9 feet, the depth interval at which the proposed sand cap would be placed. Removing this additional foot and replacing with the proposed sand cap would not improve the environmental condition of the harbor. In fact there is the potential of added environmental harm in dredging deeper sediment that may be contaminated in some areas of the main harbor. Moreover, the existing natural silt/clay 'cap' would provide a better barrier to potential transport of contaminants from underlying sediment than the proposed sand cap.

2) Removing an additional foot of sediment, as suggested, would result in unnecessary dredging and disposal costs; there is the potential in some areas of the harbor of dredging deeper contaminated sediment that would change the quality of dredged sediment and cause higher handling and disposal costs. Also, dredging of deeper contaminated sediment, even with the usual environmental precautions instituted during dredging, will raise environmental issues concerning spreading of contaminated sediment in the bay and harbor.

3) The installation of a proposed sand cap will necessitate maintenance of the cap, especially at the edge of the main harbor and channel due to the steep depth change from 8 to 12 feet in the transition from harbor to channel sediment.

4) The main harbor and channel will need to be dredged periodically. During the dredging, the sand cap will be disturbed and parts of the cap removed because of the imprecision of dredging activities. The cap will then need to be repaired at an added expense each time dredging occurs.

5) Available data regarding the integrity of the natural "cap" in the main harbor indicates a stability of sediment over the years. As a result, installation of a sand cap in the harbor will introduce a potential instability and probable need for a program to monitor the environmental conditions of the harbor sediment. The elimination of the sand cap would result in a savings by eliminating an otherwise unnecessary monitoring program.

III. Sources of PAHs in East Harbor Sediments

The DEIR states that the PAH contaminated sediments in the East Harbor "originated from a former manufactured gas plant that existed southeast of the project site . . ." In the ADL report (Arthur D. Little, 2000) and previous environmental studies of East Harbor sediment (Advanced Biological Testing, 1994, 1997, and 1998), elevated concentrations of PAHs, presumably from coal tar residues, were identified in isolated area of surface sediments and in deeper sediments of the East Harbor. In the reports, coal tar residues were the presumed or suggested source of all the PAHs in the East Harbor sediment. This is not correct. There are other significant sources of PAHs that constitute a substantial contribution to PAHs in the sediments proposed to be dredged from the harbor, including creosote pilings, urban runoff and marina operations.

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- 1) In the 2000 ADL study, samples were collected and analyzed at one-foot intervals. The concentrations of PAHs of almost all of the sediment, down to 9 feet MLLW in the main harbor and down to 10 feet MLLW in the channel, were determined to be in the range of 3 to 10 mg/kg total PAHs, well within the range commonly found in enclosed marinas, especially those containing large numbers of creosote pilings, as is the case in the East Harbor. There are over 700 individual creosote-treated pilings in the main harbor that contribute to the PAH loading of the harbor. Creosote is a distillation product of coal tar, still being produced in coal coking operations for the steel industry. Creosote has the same types and elevated concentrations of PAHs as coal tar, and has been found to be a major contributor to elevated PAHs in sediment at marinas and other facilities that use creosote pilings. Sediment in marinas containing creosote-treated pilings contain as much as two to ten times the total PAH concentration of sediment that is outside a marina, in range of 3 to 20 mg/kg (Creceilius et al. 1990).² In the East Harbor, except for a few isolated locations, the PAH concentrations in the sediment proposed to be dredged is consistently in the range of PAH concentrations in sediment in marinas containing creosote pilings. In addition to PAH from creosote-treated pilings, other activities associated with the marina itself, such as operation of internal combustion (motor boat) engines can contribute to PAH contributions in sediment.

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- 2) Another potential source of PAHs in East Harbor sediments is a large conduit (4 ft diameter) outfall in the southeast corner of the Harbor which drains the surface area around the East Harbor. This conduit discharges untreated stormwater runoff into the harbor. Recent research (Van Metre and Mahler, 2005)³ confirms that urban stormwater runoff is a significant source of PAH to sediment. Considering the myriad of potential sources of this discharge (such as roadway runoff, atmospheric deposition, residues of pavement construction and sealing, industrial/commercial operations, and hydrocarbon spills), this conduit is a source of PAHs of presently unknown quantity that contributes to the PAH loading of the harbor (this outfall discharge would be a contributing source of PAHs to the elevated PAH concentrations evident in some locations of the channel).

IV. Upland landside Phase I environmental site assessment study is not necessary

It is proposed in the DEIR that a Phase I environmental site assessment study be conducted on the upland landside areas of East Harbor. The purpose of this study is to

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² Creceilius, E. T., Fortman, et al. 1990. Contaminant Loading in Puget Sound from Two Marinas. Puget Sound Notes, J. Falgenblum (editor), Winter 1990, pp. 3-9.
³ Van Metre, P.C., and Mahler, B.J., 2005. Trends in hydrophobic Organic Contaminants in Urban and Reference Lake Sediments across the United States, 1970-2001. *Environmental Science and Technology*, 39, pp. 5567-5574.

find and delineate the extent of would-be contamination in the East Harbor from upland sources. This study is not necessary for one major reason. The sources of elevated PAHs in Harbor sediments are known. The creosote pilings, discharge from the outfall and marina operations are the major contributors of PAHs in surface harbor sediments proposed for dredging. The harbor was dredged as recently as 1989. Therefore, isolated elevated PAHs identified in the deeper portions of the harbor sediment are probable remnants of historical industrial operations that pre-date the more recent dredging. Other major contributory inputs of contaminants in sediments to be dredged from upland sources would have been identified as part of previous studies of the East Harbor (Arthur D. Little, 2000; Advanced Biological Testing, 1994, 1997, and 1998).

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V. Conclusion

The DEIR contains insufficient information to support the proposed approach to dredging, capping and disposal of sediment from the East Harbor, as stated above. Significant new information will be required before preparation of the Final EIR, requiring recirculation pursuant to 14 Cal. Code Regs. 15088.5 (a) and Public Resources Code 21092.1.

Very truly yours,

Robert C. Doss



City & County of S.F.
Dept. of City Planning

OCT 21 2005

OFFICE OF
ENVIRONMENTAL REVIEW October 19, 2005

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Subject: San Francisco Marina Renovation Project

Dear Mr. Maltzer:

I am writing today on behalf of the San Francisco Bay Trail Project. The Bay Trail Project is a nonprofit organization administered by the Association of Bay Area Governments (ABAG) that plans, promotes and advocates for the implementation of a continuous 500-mile bicycling and hiking path around San Francisco Bay. When complete, the trail will pass through 47 cities, all nine Bay Area counties, and cross seven toll bridges. To date, slightly more than half the length of the Bay Trail alignment has been developed. An important piece of the City of San Francisco's Bay Trail runs through the Marina Green directly adjacent to the proposed San Francisco Marina Renovation Project, and is the subject of this letter.

Bay Trail Plan and Policies

The Bay Trail Project submitted comments on the NOP for the DEIR regarding improvements to 4,800 feet of Bay Trail within the project area. The final EIR (FEIR) should include a tailored discussion of how the proposed project relates to the Bay Trail Plan and Policies, and what impacts to current or future use of the Bay Trail may occur due to increased traffic, a rerouting of traffic patterns, temporary impacts/closures during construction, views of the Bay from the Trail, and connectivity of the trail to segments to the north and south of the project area. The Bay Trail Plan has been adopted at a regional level and policies supporting the completion of the system have been incorporated into the San Francisco General Plan. It is important that the FEIR address these policies and how the proposed project may affect implementation or use of the Bay Trail.

Safety Issues at Fort Mason Path/Laguna/Marina Blvd. Intersection

The area of the east harbor parking lot has long been not only a significant gap in the Bay Trail system, but also a serious safety problem. This is a very popular and heavily used section of the Bay Trail in San Francisco, however, the current configuration forces cyclists from a pleasant Class I separated pathway through Upper Fort Mason to a sudden dead-end into high-speed traffic at Laguna and Marina Blvd. Cyclists must come

Administered by the Association of Bay Area Governments
San Francisco Planning Department
Joseph P. Bori (Assistant Director) - 101 Eighth Street, Oakland California 94607-4725
Phone: 510-464-7332
Fax: 510-464-7979

to a stop while traveling downhill, dismount to access the narrow sidewalk leading to the parking lot where there is no curb cut, and ride through a dangerous, un-striped parking lot before returning to a separated pathway in front of the Marina Green. As the planning department is aware, thousands of recreational cyclists, tourists, and commuters use this alignment. While the downhill grade that dead-ends into high-speed traffic at Bay and Marina may be negotiable for experienced cyclists, users of all types ride this route because of the beautiful waterfront experience that is provided.

9.1
cont

The Preliminary Negative Declaration that was prepared for this project prior to the decision to prepare a full Environmental Impact Report made reference to improving 4,800 linear feet of this segment of Bay Trail. For some reason, these proposed improvements were dropped from the project description for the DEIR. While the proposed improvements would not have entirely solved the safety issues related to the Fort Mason pathway at Laguna/Marina and the east harbor parking lot, they were an opportunity to at least temporarily address a serious safety issue. It is our hope that the FEIR will return these improvements to the project description. If this is not possible, we would like to work with you and other City departments to address this issue in another forum.

9.3

Thank you for the opportunity to provide comments on this important project. If you have questions or if I can be of any assistance, please do not hesitate to contact me at (510) 464-7909, or by e-mail at maureeng@abag.ca.gov.

Sincerely,

Maureen Gaffney
Bay Trail Planner

9.5

9.1

Law Office of
Stuart M. Flashman
5626 Ocean View Drive
Oakland, CA 94618-1533
(510) 652-5373 (voice & FAX)
e-mail: sturflash@aol.com

City & County of S.F.
Dept. of City Planning

OCT 21 2005

OFFICE OF
ENVIRONMENTAL REVIEW

October 20, 2005.

Mr. Paul Meltzer
Environmental Review Officer
San Francisco Planning Department
1600 Mission Street, Suite 500
San Francisco, CA 94103

RE: Scoping for EIR for S.F. Marina Renovation Project (2002.1129E).

Dear Mr. Meltzer,

I am writing on behalf of my client, the San Francisco Bay Chapter of the Sierra Club ("Club"), to comment on the Draft Environmental Impact Report for the above-referenced project (hereinafter, "the Project"). As you know, the Club has a long-standing interest in the Bay, and specifically with the San Francisco shoreline of the Bay. The Club previously commented on and successfully appealed the Department's previous preliminary determination to approve the Project under a mitigated negative declaration.

The Club continues to believe that the Project will have significant impacts on the environment, as already set forth in its comment/appeal letter on the previous draft mitigated negative declaration. That letter is already in your department files and, because many of its comments remain relevant to the DEIR, it is incorporated herein by this reference, and a copy should be included in, and responded to (to the extent not already addressed in the DEIR) in the Final EIR.

The Club wishes to comment additionally and in more detail on the DEIR's analysis of visual impacts. The DEIR includes several panoramic view photographs which purport to show current views from the Marina area, along with photomontages based on those photographs which purport to show the effects of the proposed project on those views. However, as the DEIR notes in a footnote, the panoramic photographs are subject to "barrel distortion", making those objects located near the far end of the view appear smaller, and those near the center appear larger. The result is that the photographs are not accurate representation of what an observer at the Marina would actually see. In particular, Figures 8A and B include a view of the Golden Gate Bridge, but because the bridge image is located near the far end of the photograph, that view is not given its proper significance. Further, because the photos were all only done in black and white, the prominent red coloring of the bridge does not stand out as it would to a real observer. Consequently, the DEIR has badly understated the view impacts of the proposed project on this view. The Sierra Club's comment/appeal letter on the prior proposed mitigated negative declaration included a photograph from the Marina (near the site labeled "View 4" in Figure 4) looking towards the Golden Gate Bridge. That photograph more accurately shows the significance of the view. The EIR should be revised to include a photo accurately showing how the Golden Gate Bridge currently appears to observers at the Marina, and the effects of the Project on those views.

Further, the photomontages intended to show Project impacts on views, while they show the higher mast heights expected under the proposed project, do not show the increased height of the decks and other superstructure in the larger boats proposed as part of the project. Again, the Sierra Club's prior comment letter provided some

Mr. Paul Meltzer
S.F. Planning Dept.
10/20/2005
Page 2

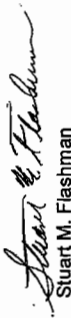
examples of how larger boats tend to have higher decks and cabin superstructures. The EIR should be revised so that the photomontages accurately reflect the effects of these taller vessels on views.

It should be noted that even with the distorted panoramic view provided in the DEIR and the failure to take into account the larger boats' taller superstructures, the photomontage in Figure 8 still appears to indicate that the Golden Gate Bridge would no longer be clearly visible under the project scenario, but would have its view obstructed by numerous masts. This should have been disclosed as a significant visual impact. As mitigation, the EIR should discuss reconfiguring the locations of larger boat docking areas to locate them away from this and other significant views.

Please notify both the Club and myself of all future events in the environmental review of the Project and provide us with copies of the revised and final EIR when they become available. The Club's address for purposes of this Project is given below:

Sierra Club
San Francisco Bay Chapter
San Francisco Group
c/o Mr. John Rizzo
1621 Waller Street
San Francisco, CA 94117

Most sincerely,



Stuart M. Flashman

cc: J. Rizzo

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4.8
cont'

4.9

"Ralph Kanz"
<kanz@earthlink.net>
10/20/2005 01:13 PM

To: lisa.gibson@sfgov.org

cc

bcc

Please respond to
kanz@earthlink.net

Subject: San Francisco Marina Renovation Project DEIR Comments



Making San Francisco Bay Better

City & County of S.F.
Dept. of City Planning

OCT 21 2005

OFFICE OF
ENVIRONMENTAL REVIEW

October 20, 2005

Ms. Gibson,

After reviewing the above reference DEIR, I have the following comments:

The possibility of using a sheet pile breakwater in the East Harbor is never analyzed. The assumptions used to justify the floating breakwater are flawed given the history of floating breakwaters in the area. The Pier 39 breakwater was originally a floating design that failed and had to be replaced with a solid structure. There is mention of proposed improvements to Pier 1, but no time is specified, and the proposed East Harbor improvements are not currently planned. Would improvements to Pier 1 impact the design and schedule for the East Harbor Breakwater? The analysis also fails to deal with the impact of vessel wakes. Both the ferry boats and ships create wakes that significantly impact the Marina. Outbound vessels have the greatest impact.

Page III.A-8: "While the proposed project would make changes to site development, it would not disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any business, residences or other uses." The project would impact the small boat commercial fishermen that currently use the facility. There is not another comparable facility in the area that provides the necessary infrastructure to support their businesses. The project will displace these people and the DEIR fails to address this issue. The new berths design with reduced gate access will make it more difficult to move fish and gear on the docks. The existing commercial fleet consists of vessels less than 25 feet in length, and the proposed improvements would have berths 30 feet and longer. The increased costs of the new facility will also lead to displacement of these businesses.

The leaking oil in the East Harbor is never addressed in the DEIR. Every time there are minus tides leaking oil appears in the fairway between gates 8 and 10. How will the project deal with this leaking oil container?

Please send me a copy of the Final EIR for this project and contact me if you have any further questions.

Ralph Kanz
4808 Congress Ave.
Oakland, CA 94601

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, California 94103

SUBJECT: Draft Environmental Impact Report (EIR) for
the San Francisco Marina Renovation Project
State Clearinghouse Number 2003122131
BCDC Inquiry File No. MC.MC.7812.1

Dear Mr. Maltzer:

On September 6, 2005, San Francisco Bay Conservation and Development Commission staff received the Draft Environmental Impact Report (EIR) prepared by the San Francisco Planning Department for the San Francisco Marina Renovation Project, proposed at the San Francisco Marina located in the Marina District, along San Francisco's Northern Waterfront. The project would consist of renovations to selected marina facilities in both the East and West Harbors of the Marina as well as landside improvements. Renovations would include constructing new breakwaters in both harbors, removing and/or reducing the length of existing breakwaters, renovating and upgrading existing boat services, dredging both harbors, renovating existing boat slips, upgrading and/or enlarging public restrooms, constructing a new maintenance building and other assorted improvements.

The Commission's staff has reviewed the EIR and is submitting its comments regarding the document. Although the Commission itself has not reviewed the EIR, the staff comments are based on the McAteer-Petris Act, the Commission's *San Francisco Bay Plan* (Bay Plan), the Commission's federally-approved management program for the San Francisco Bay, and the federal Coastal Zone Management Act (CZMA).

Jurisdiction

The Commission's jurisdiction includes all tidal areas of the Bay up to the line of mean high tide (the inland edge of marsh vegetation in marshlands), all areas formerly subject to tidal action that have been filled since September 17, 1965, and the "shoreline band," which extends 100 feet inland from and parallel to the Bay shoreline.

Commission permits are required for certain activities, including construction, changes of use, dredging, and dredged material disposal, within its area of jurisdiction. Permits are issued if the Commission finds the activities to be consistent with the McAteer-Petris Act and the policies and findings of the Bay Plan. In addition to any needed permits under its state authority, federal actions, permits, and grants that affect the Commission's jurisdiction are subject to review by the Commission, pursuant to the federal Coastal Zone

State of California - SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION - Arnold Schwarzenegger, Governor
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Management Act (CZMA), for their consistency with the Commission's federally-approved management program for the Bay. It appears that the majority of the project would occur within the Commission's jurisdiction and require Commission authorization.

Public Access

Section 66602 of the McAteer-Petris Act states, "...that existing public access to the shoreline and the waters of the San Francisco Bay is in adequate and that maximum feasible public access to the Bay, consistent with a proposed project, should be provided...." The Draft EIR states that public access improvements would be made to public restrooms as well as along a portion of the East Harbor breakwater. ADA-compliant access ramps would be added in the East and West Harbors. Additionally, a new public access dock is proposed in the West Harbor

In order to fully evaluate the public access proposed with the project, more information should be provided in the EIR regarding existing public access at the site. For example, is the public currently allowed to access the breakwaters that would be removed with the project? Is access currently occurring on the breakwater that would be improved with a public access path? Is the public currently allowed to access any of the gangways and ramps in the marina? A site plan showing existing access with proposed new access overlaid on it would be extremely helpful in understanding current and future public access at the project site. Additionally, details regarding the proposed access are also needed such as are there opportunities for public access amenities on the breakwater (e.g., benches, etc.)? Is dedicated public access parking proposed in the vicinity of the breakwater access and the new public access dock? Providing more information will aid the staff in determining whether the public access proposed with the project is the maximum feasible, consistent with the project.

Bay Fill

Section 66605 of the McAteer-Petris Act states, among other things, that further filling of the Bay should only be authorized if it is in the minimum amount necessary to achieve the purpose of the fill and if harmful effects associated with its placement are minimized. The Draft EIR states that the final design for the breakwaters are currently in process and the new breakwaters would either be constructed of rock, sheet pile or floating material. As the amount of fill placed with each of the alternatives would differ as well as their potential impacts, it is important to provide more information regarding the final design of the breakwaters and the potential impacts in order for the staff to evaluate the potential effects associated with the fill and to determine whether the fill placement would need to be mitigated. Additionally, the EIR states that with reconfiguration and berth lengthening, an additional 34,000 square feet of fill would be placed for floating docks. As this is a considerable increase in the amount of fill at the site, it is possible that the Commission could require mitigation to offset the impacts associated with the fill placed for the docks.

Dredging

The EIR states that both the East and West Harbors would be dredged to accommodate the project. The East Harbor would be overdredged an additional two feet to allow for the placement of an engineered cap that would prevent the disturbance of contaminated sediments. As the marina is an area that needs to be periodically dredged, we are concerned that future dredging episodes could penetrate the cap. Please provide more information regarding the cap and the potential for disruption of the cap during future dredging activities.


Impacts on Bay Resources

The EIR states that a total of 705 creosote-treated piles would be removed and replaced with 750 concrete piles. While the Commission encourages the replacement of creosote-treated

piles, the shear number of piles that would be replaced raises issues regarding pile driving and its impacts on fish and other aquatic species. The EIR should evaluate the potential impacts of pile-driving, the sound pressure levels that would be generated and propose mitigation measures that would reduce potential impacts associated with pile driving (e.g., bubble curtain). In addition, the EIR should include mitigation restricting all in-Bay construction activities to discrete times of the year that would avoid impacts to special-status fish species and managed fisheries.

Thank you for providing staff with the opportunity to review the EIR for the proposed project. We recognize the importance of this project and are looking forward to working with your staff to develop the final document and any subsequent permit application materials. Please feel free to contact me at (415) 352-3659, or email me at michelle@bdc.ca.gov if you should have questions regarding this letter or the Commission's policies and permitting process.

3.9

Sincerely,

MICHELLE BURT LEVENSON
Permit Analyst

MBL/mb

3.10

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11.12

Dear Planning commission,
The following are questions and concerns to consider in plans to change the San Francisco Marina.
S.F. Planning case # 2002.1129E

Where will I park under proposed plan that removes all parking on East West mole? When parking is mitigated for in new plan, please show on map where it will be relative in distance to where it is currently.

9.8

Please show reason for removal of right of ingress and egress to my vessel as well as others via East West mole where loading and unloading currently occurs for hundred or more berths.

Why is there no plan for a lottery for the added larger berths and where in; allowances or preference made for those who would lose or see degraded their existing berths? Current list was for existing berths while berth holders could not for see being forced out.

2.14

Proposed plan would remove cobble stone walls and replace with vinyl docks like generic harbors destroying environmental quality. Was there any effort to look at other options?

4.10

Why photos in this EIR are shot on inch from the ground escapes me. Why are the 'real views' not shot. Views of the bridge from the Marina green but most important where are the views from boats as they enter harbor. This is a view more relative to the project.

2.15

Why is planned entrance of West harbor not as other parts of harbor such as stone or granite, something with same character as exists now. Does this plan seek to change environmental quality?

4.11

As it pertains to blocked views of the Golden Gate bridge from the marina, Marina neighbors and Marina Boulevard how is the environment made equal or better?

11.3

What studies could be done that would show where blocking of sunlight would occur from placement of three story or larger motor vessels and whether it would cause smaller vessels to be damp, cold and or moldy creating diminished values or damage to said same.

Is the intention of this plan to ignore ADA law by removing handicapped parking, and or egress and ingress by way of removal of East West mole?

9.8

Why is the general parking removal (a dozen spaces) not mentioned in this draft EIR (located a top the East West mole)? These were the most used anywhere in the system.

9.8
cont

How would we (the boaters) or public be benefited by the removal of the secure locked gate used by all, while away on ocean cruises on the East West mole.

What's to say Marina Boulevard is not put in further danger by dredging harbor deeper and removal of East West mole removed to accommodate the deeper drafted super yachts?

6.2

What proof is there that smaller craft (20 to 25 foot) use 2 stroke motors when these craft rarely if ever use motors at all?

What is the cost of creating a dock that can withstand the massive tons of the mega yachts compared to the small little sail boats this plan would see removed.

2.16

What is the policy as it stands towards the leasing of slips to yacht clubs are they the same? What if any preference is shown to them in placement of where boats may go and whom they rent to and for how much?

This plan on page 33 uses a table with the term 'assumed' referring to a model supplied to the Bay Area Air Quality Control Management District. Does that make it fact? Please show more detail how air quality proposed will be made better by boats of many times the current displacement.

11.8

Why is there no practical proof (such as placed or failed adds) that tell us no market exists for 20 footers in the marina? Each marina is different so can we 'assume' you are assuming there is need for it or fact there is no market for 20 footers near the Golden Gate bridge?

2.3

Some marina's give one parking space for each berth rented yet this plan while it states no change in parking removes the most critical parking to central and most populated dock. Why is there no mention of East West mole parking removed in this plan?

9.8

While this plan proposes no change in parking, if it is the same as current it will issue two permits for each of the 628 proposed berths and 'assumes'

they will all park in a mere 208 spaces. That's not including visiting boats, or added usage such as boat ramp, hand boat ramp commercial charters and added passengers and crews for larger proposed boats.

There is also the issue of how this plan pools all parking spaces together which 'assumes' boaters will walk from across the harbor (roughly half a mile) or all the way from Gas Light Cove to West harbor or vice versa. Boaters are not tourists or shoppers who can simply turn around and go home. They have a responsibility to see to it that their boats are maintained on a schedule. What is in this plan that saves the public recreation area from absorbing needed new boat parking.

Please show on a map where parking is proposed for the 66 new berths proposed to locate at the central dock off the East West mole. Please show handicapped places as required in same.

Since currently, park vehicles use no parking zones, is it acceptable to 'assume' they don't need any parking spaces as plan suggests? Please designate on map where the marina maintenance vehicles will park at night and where they will park at peak usage while serving areas away from proposed office such as distant docks, ramps and rest rooms.

*Should the more elite vessels choose, they can run heat through out their motors maintaining a 160 degree tempature at all times to expel moisture. Such ideas present a greater risk of electrolysis, are any studies going to occur to look into this or is making our harbor a 'hot' harbor acceptable?

Please designate on map where the loading and unloading of boats will occur as proposed, 'hand boat ramp' with added parking in same area.

Shall it be only assumed no one will try to get around the two hour parking for their boat trailer? Could it be assumed they will park trailer in neighborhood, returning in a second vehicle. Let's not 'assume' a parking ticket will solve a situation where we make a boat ramp we don't really want people to use because of inadequate parking.

There is a large charter or excursion boat currently departing from west harbor on week ends and I know of no land use permit. Please help me with date for land use change permit issued (if any) from recreation to commercial use.

9.8
cont

2.17

9.12

3.1

Please designate where in this purposed map the large garbage dumpster or dumpsters will be located to serve all the new and old dock users near the East West mole.

Please show where fire police and rescue vehicles will access their rescue and body retrieval equipment currently near the harbor master's office (used on emergencies and or training drills).

General Comments;

Air Pollution

Let me point out first that none of the motor boats proposed make use of or are planning to make use of smog devices.

The pollution associated with the proposed replacement of small sail boats with ship type super yachts will not clean the air as has been implied or stated in this draft EIR.

11.9

Since terms such as 'assumed' ("Table 3 page 33 "Marine Operation Conditions" far right) are used there is little point in using supplied facts on increased emissions. existing' The idea that 164 vessels under 40 feet make an assumed 4.9 trips on peak days is based in lunacy but then reiterated by BAAQCMD to pretend it is fact.

Air quality is too important to all those who exercise and recreate in the marina green and surrounding area to assume or trust anyone's word on it. I will sign the science of pollution as recognized and posted on the net by state and federal government agencies and or guidelines.

Big boats constitute far more pollution and if that is some thing you don't believe I have to wonder if you're not newest of a long line of new owners of that red bridge someone sold you. Seriously though, small sail boats may in some instances use outboards to get in the harbor but almost never. The proposed narrowing of the channel will insure far more motoring, since vessels of greater length can not tack in and this plan does away with the smaller sailing craft. These smaller craft are those that our younger, less affluent population can afford and I expect this will diminish farther still the sailors of tomorrow.

Larger vessels must warm up for 1/2 hour as manufactures recommend, since cold motors often stall. * (Some variations exist). True, most boats won't put out the familiar plumes of black smoke but that won't matter because the killer carbon monoxide gas can not be seen, tasted or smelled.

They say, and maybe they are right that these so called pleasure craft rarely go out. That is a non-issue! *Almost every motor in the harbor to be safely operated and maintained must be started and ran at least once 1/2 hour one to four times a month minimum in accordance with manufacture's recommendations, and this is whether getting under way or not.

Let me point out that the carbon monoxide related to these and all engines cause death to swimmers and boaters alike, every year!
So many deaths in fact. The governor this year signed into law a bill banning devices towed from the stern because so many had died from inhaling the deadly gas.

Larger boats constitute an increase in carbon monoxide emissions that cannot be measured. That is because it would rely on consistency. That is what's missing here since only cars have needed inspections and there are no plans to change that nor can it be changed.

The new mega yachts will likely experience clean air blowing in over their bows facing the Golden Gate bridge as proposed.
But for those rest of us behind them it's a much grimmer picture in the face of their exhaust pipes.

Down in the basin of West harbor there will be under the proposed plan, 250 large, extra large, and mega sized boats a whopping 628 surrounding the Marina Green and other highlights of the San Francisco waterfront all of which can start up at any given time, on any given day.

The P.M.10s and other pollutant gases from these engines is most likely to spill out over Marina Boulevard driven by the prevailing breezes moving South to South-East most mornings. This will be most intense on Saturdays, Sundays and holidays when park users and boat users will be at peak usage. At times when joggers will be most present and just down wind on the edge of the marina. Events such as bike rides and the city's Bay to Breakers will certainly feel it. There can be no doubt this plan will diminishing the air and quality of life in the area then and it isn't to say it won't see joggers all day, every day. It will.

It is well established in fact that people who jog, run or intensely exercise would be better off not in light of the chance of such conditions where inhalation of smog will penetrate lungs deeper. This may be sufficient

11.10

11.11

enough on some days to trigger an asthma attack in more vulnerable receptors.

At 1 to 70 parts per million health impacts are not known, but at 150 to 200 parts per million, symptoms such as headache, fatigue and nausea become noticeable and above that death can occur.

There is also the 'Particulate Matter.' Under ten microns they are referred to as PM10s. PM5s or PM2.5s These are so small they lodge to deep in your lungs to be expelled. Motors constitute the single highest risk to peoples health as related air pollution

Please look at table of boats proposed on page II-9 and see what will replace our the smallest twenty footers who sail in and out without motors.

Without even serious math you can see the large to extremely large boats dominate the picture in four of the five plans in this EIR.

Notice motor boats constitute 37 % over all (same page, bottom of chart). These use two big block V-8s even for the 35 footers.

These are the same as we call gas guzzlers on the road only most are diesel motors go up from there to semi truck sized engines.

Unlike on the road these will operate with no emission devices or inspections.

This project would send poisonous gases from these in into hundreds of homes, our schools and businesses that line the south side of the marina.

Seniors, who wash dishes under open windows or get out to plant flower gardens will feel if not taste it in the air. It's not like they can just hop in their car to go elsewhere or stop breathing for a while. Shall we diminish all of these peoples quality of life so a few elite may realize their dream of owning a super sized yacht.

The carbon monoxide and other gases may by mid-morning on most days change direction sending it east toward the Marina green and Lower Fort Mason as the valley heats up drawing in cool air off the sea. People conserving air by riding bicycles or those new air saving, battery driven devices will be breathing the second hand smoke as they pass.

Those who will suffer from the ill effects will in the west harbor basin where the gases will be all too chokingly clear. Yet they will have little choice either because they will be working on keeping up their boats.

This is especially harmful on days where there is an inversion. On such days, nesting or not, the wildlife such as Blue herons, White egrets, Mallards, seals, otters, pelicans and more will suffer most and perhaps even die.

11.11

By afternoon (most days) the stronger winds will draw off the carbon monoxide and PM 10s. Lessers but there are many days when there is no wind at all. On such days there can be no doubt we won't have the air quality of a truck stop.

SOUND POLLUTION

While the boats in the marina currently cause something in the order of sound pollution it is no where near that of the race boats. There are no restrictions on these in the area of annoyance except what an officer will take on by the seat of his pants. Noise meters are very rare and without one only opinion guides the court on how loud it was. Boys will have their toys but none come close to the 'Cigarette boat.' These are those long magnum boats made famous by the show 'Miami Vice.' Why the name I'm am not sure but they do smoke a lot... They have a massive three engine compliment of super charged gasoline or formula engines that are deafening to say the least. These would well wear the name 'Water dragster.' They are designed to fly really. With their extended prop shafts they can remain in the air while their submerged props slice up much anything they come in contact with. Wild and marine can hardly expect to avoid them. Props in general kill so many things in water that gulls come out and follow them to feed in their wake. No matter the type, whenever a race boat is on the bay you can hear it. It's their nature. Still, it is a free country...(I guess). Another problem is the new stereo systems that trash our ears on the road ways and now seek to join us on the water. These boy's toys terrify wild life and make listening for other boats or their signals impossible not to mention their peace shattering existence in marinas.

11.4

WHY NOT A LOTTERY

I feel strongly those displaced should receive a fair chance at a new berth. There is mention that a line exists already to get the new berths but that is hardly fair. That list was for berths currently on line as people willingly left. In the spirit of fairness and to avoid even the appearance of favoaritism there should be a lottery since this is a recreation area. This is an accepted practice in many harbors on the west coast.

2.14

WATER POLLUTION

11.13

The water pollution associated with boats is well documented. Voluntary or not all boats expel unwanted contaminants in the water. It is a necessary evil with marinas and the more or bigger the boats the more pollution. Many strides have been made but there is no way to completely stop it. Most of it is unintentional and the sinking of a larger boat has greater potential for hundreds of gallons of fuel to be released. The fines are substantial but it is also in most cases unavoidable. Almost all boats that use engines have water pumped through the engine before exiting through a water cooled exhaust system which is pumped over board. The washing of decks and polishing of fiberglass sends pollutants into the harbor as well. The large white plastic house boats will of course do this and no matter the intentions of the owner send many gallons of it overboard.

11.13

Another overlooked source of water contaminants is poisonous paint sold for bottoms of vessels to fend off slime and growths of every description. While these paints are of milder extraction than the old red leads or arsenic paints of the past, many copper based paints today pollute the water. New paints such as ablatives break off as organisms attach them selves exposing new layers of poison. This is due to their chalky nature. Ablatives are least expensive but all paints are a source of contaminants and once again bigger the boat, the more to deal with. The pumping out of boats is also a large source of contamination. All boats get water in them whether from above or below and all boats must pump out but engines must be washed and bigges flushed out. The more in size the more capacity for damage to water quality. Pumping sewage may also be a problem.

TIDAL SURGES

Many people don't realize what happens in the instance of a tidal surge. They are not as uncommon as you would think. Many boats know they can best survive this kind of disaster by making it to out to open water and simply riding over it. The worst case scenario is when boats are unable to because of size or congestion to do so. We have all seen the pictures of towns buried in a tangle of boats and docks. How this happens is the posts or piling to a dock are only so tall; when the tide comes in or ebbs the dock rides up and down on these keeping boats and dock anchored to pilings. When a tidal wave or massive surge comes it cause the dock to ride above the pilings un-anchoring docks and allowing boats to wash ashore. Large boats weigh more and this means they push

11.14

harder against pilings. Piling must be longer to reach the depth they sit at. This gives more leverage and weight to topple pilings and the proposed plan would more than double the weight of existing boats.

People are not killed by the water so often as objects in the water driven at them, such as boats and debris. The bigger the net work of docks, plus the larger boats represent greater potential for property damage and loss of life. The large boats proposed in this plan could weigh in at tens of tons and when unleashed into a neighbor hood would look like the proverbial bull in a china shop.

Again, lighter craft are not only likely to survive and do less damage but offer a source of rescue. Certainly they dislodged, float or can be carried off far more readily.

The only affordable way I know to mitigate for this is to have a reduced number and size of boat in the harbor.

Please feel free to write to me what you have as I and others prepare for your meeting on the subject of this Draft EIR so we can be current on all issues before hand since it will likely be a long night...

Thank You for your time. I assure you this was no simple matter for me either. Yet I feel strongly in light of what I will lose and absolutely committed to respond to this draft plan that might destroy years of my work as well as jeopardize the hopes and dreams for all who enjoy the Marina area and share in it's concerns for the future.

*Larger boats can present a serious threat since they have more extensive electronics and put existing boats in jeopardy of electrocution. Electrocution, while not clearly understood can eat up the fasteners (screws) holding classic wooden vessels together but it is a major problem for any boat regardless of hull material. The west harbor is not by nature 'hot' but this could make it so.

Will LeRoy
PO box 913
Antioch Ca.
94509
CC: 200 not listing.

10

To: Planning Department, City and County of San Francisco
From: Bruce Munro, 3487 Washington St., San Francisco, CA 94118
Date: Jan. 16, 2006
Subject: Public Comment on San Francisco Marina Renovation, Case # 2002.1129E

My name is Bruce Munro and I offer the following public comment on the Marina Harbor renovation project. I have been a tenant in the harbor for over 20 years. I currently occupy berth no. 247 along the Marina Blvd. seawall with my 40 foot sailboat, the Princess. I have been an active boater for over 50 years and I have been involved with countless marinas in this country and abroad. I am a member of the St. Francis Yacht Club and was its commodore for the year 2000. I support some and oppose some of the plans put forward by the Recreation and Park (RP) department for a renovation of the harbor. Below I explain what I support and what I oppose as well as the reasons for both.

1. **Replacement of Docks:** I strongly support this aspect of the plan. Nearly all the docks are in terrible shape with numerous rotted planks, nails sticking up, missing boards, etc. This is due, I am sorry to say, to woefully inadequate maintenance by the RP managers over many years. If we had proper ongoing maintenance this would not be the case but, sadly, that is the case and the docks, pilings, and associated electrical and plumbing need complete replacement.

2. **Breakwaters for Outer West Harbor:** I support new breakwaters for the outer west harbor. They are absolutely essential to have a marina in that part of the harbor. The wave and surge action in that part of the harbor is too strong for mooring boats. The docks themselves take a terrible beating from the strong action of the water. Unless new breakwaters are installed, the outer west harbor should be abandoned - it is that bad.

3. **Removal of the Harbormaster's Office to a Renovated Degaussing Station:** I strongly oppose this aspect of the plan. It is probably the worst idea in the whole plan. The degaussing station is an eyesore and should be torn down. The Harbormaster's office should stay where it is - overlooking the west harbor. If expansion is needed, the expansion should take place at the location of the existing office. A harbormaster's office should be located within the harbor that is being managed. The harbormaster needs to be able to see the docks, lines and facilities in the harbor to spot any problems that may develop. As it is now, the harbormaster can observe the west harbor but not the east harbor. If the office is moved to the degaussing station, he will be able to observe neither harbor. There would be a wonderful view of the bay and to some extent a view of the entrance to the west harbor, but that is not what is needed. This is a very unwise proposal and only seems to be to improve the view of the bay for the harbormaster. There is plenty of room to expand the harbormaster's office at its present location. There is no need to move it to a location that is removed from both harbors. This is a bad idea.

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RECEIVED
JAN 18 2006
BY: *[Signature]*

**SIERRA CLUB
SAN FRANCISCO GROUP**
85 Second Street, Box SFG, San Francisco, CA 94105

3.4
4. **Removal of the Scott St. Mole:** I am opposed to the removal of this mole. It provides pedestrian public access to the harbor and provides a valuable breakwater for the inner west harbor. It will be expensive to remove and the expense will not justify the few additional berths that can be accommodated by removal of this short mole.

9.8
5. **Removal of the East/West Mole that is West of the Harbormaster's Office:** I oppose the removal of this mole. It provides a valuable calming barrier for the waters in the west harbor. It also is the only place in the entire marina where tenants can find secure parking. Boaters frequently spend several days away from the harbor on their boats. They must park their cars around the marina area overnight for several nights. This mole provides secure parking behind a locked gate and it is the only place in the harbor that does so. I normally park my car near my boat along Marina Blvd. When I leave for a night or more, I move it to this mole because of the security it provides. Cars parked all night long along Marina Blvd are subject to vandals. I once had my car keyed when I parked it there over night. Again, it would be a substantial expense to remove this mole and dredge the area to harbor depth. The expense will not be worth the additional revenue that can be generated by the few additional berths this would create.

2.5
6. **Construction of a New Maintenance Building:** I oppose this new building as unnecessary. The harbor now has use of a maintenance building that is owned by the PUC. The PUC has not indicated an intention of evicting the harbor from this building. This building has not been used by the PUC since the new sewer system was built during the 1970s. There is no indication that they will ever need to use it again. In the unlikely event that the PUC decides to use it again, that would be the time to build a new maintenance facility. It is not necessary now and would be a considerable expense that would be paid for by harbor tenants.

7. **Seismic Retrofitting of the Harbor Seawalls:** This item is not proposed by RP, but it is being advocated by certain Marina political activists. It has no place in the harbor renovation plan. The seawalls were undamaged by the 1989 earthquake. Some Marina District residents believe that earthquake damage in the Marina District could be reduced if the seawalls are retrofitted. The RP's earthquake consultant, Mr. Rollo, states that such retrofitting will not help the Marina District from the effects of an earthquake. But, even if it did, why should the harbor tenants pay to prevent the effects of an earthquake for the Marina homeowners? The harbor renovation will be paid for entirely by harbor tenant revenues. If there is a public safety issue in the Marina District, that is for the city to resolve, not the harbor tenants. RP has rejected this idea and properly so. The seawalls are some of the few facilities in the harbor that are in good shape. There are no cracks, bulges or deformations, even after the 1989 earthquake. Retrofitting them at great expense would be entirely inappropriate for the harbor renovation project.

Thank you for considering these comments.

Bruce Munn

January 17, 2006

Paul Maltzer, Environmental Review Officer
Planning Department, FAX 558-6409
1660 Mission Street
San Francisco CA 94103-2414

Re: SF Marina Renovation Draft EIR
Case No. 2002.1129E Comments

Dear Mr. Maltzer,

Thank you for the opportunity to comment on the subject DEIR. The Sierra Club requested that this DEIR be produced and these comments will show that the project has severe, but until now, nearly hidden impacts, which can be mitigated. However the mitigations may require reissuing the DEIR to cover an alternative. In addition we will solutions to some of the problems which accompany the alternative:

CEQA Comments:

- 1) Page II -9 Table 1 Proposed Waterside Improvements is written in an attempt to minimize impacts. Table 1 shows changes to aspects of the marina ranging from about 15% to over 25% for floating dock coverage. This constitutes a large visual impact. In addition, the table infers but does not clearly state that the "improvements" result in a loss of 94% of slips for boats 25 feet and shorter. This is a very large impact which goes against the history and recreational uses of the facility. Table 1 should be corrected to fully describe the visual and recreational impacts. 4.13
- 2) The DEIR as written is an attempt to change the history as well as the name of the facility. The title of the project and Historic Resources section of the EIR, IILC-2 should be changed to show the proper name of the facility and also state that all of the 1966 improvements were funded by a low interest loan from the State. Quarterly invoices and the recent notification of berth fee increases are headed by the proper name of the facility, "San Francisco Marina Small Craft Harbor". 5.5
- 3) Page III.A-3 does not reference all of the applicable Plans and Policies. The EIR should be changed by adding the following from the Open Space and Recreation Element of the San Francisco General Plan. From the regional section: **POLICY 1.2** "Make open space lands already in public ownership accessible to the public for compatible recreational uses", and **POLICY 1.3** "increase the accessibility of regional parks by locating new parks near population centers, establishing low user costs, improving public transit service to parks and creating regional bike and hiking trails." 3.11

These policies along with the facts that the project will take place on land transferred from the State to the City in 1963; be reconstructed using a low interest loan from the State and is a City and regional facility, indicate that the reduction in the number of small boats slips is not consistent with all the applicable policies. In fact the proposed renovation essentially eliminates historic and essential small boat access to the Bay from the Marina. All of this together makes eliminating small boats a CEQA access issue.

4) The DEIR discusses the renovation of the east harbor hoist and 24 trailer parking spaces, which can be inferred to be a reasonable method to replace the loss of 94% of the existing small boat slips. However, the hoist will not be used to replace this loss. The hoist may be useful "on a daily basis" for some small power boats but will not be useful for small sailboats. Please consider that a 20 foot family sailboat will weigh almost one ton while a 25 foot boat will weigh about twice as much. For a small boat owner to use the hoist will require the owner to have a heavy duty vehicle to tow a very heavy road suitable trailer. In addition, the owner will need to store the boat and trailer between uses. When the vehicle and trailer are at the Marina stepping the mast of a 20 foot sailboat requires the efforts of two or three strong, experienced sailors for about two hours and the process will have to be repeated at the end of the day. Stepping the mast for a 25 foot boat is usually done by professionals using a crane. Thus, most small sailboat sailors will rarely use the hoist and will instead have to travel great distances in congestion to an alternate marina or stop sailing. This is a very large access impact which can be mitigated.

Light weight racing sailboats have lighter masts and they may occasionally use the hoist, but these people will generally use the hoist at the St. Francis Yacht Club when they come for regattas. The proposed hoist may be useful for dinghies, which weigh less than 300 pounds and have light masts which can be stepped by one or two people in about 15 minutes. But, most of these boats will prefer to hand carry their boats from their light trailer to the Bay and launch off the beach in the Presidio because there is no charge.

5) The proposed renovation will deny owners of small sailboats the ability to rent a slip in the water or a dry storage space adjacent to the water. Thus, the proposed renovation will essentially deny these people access to the Bay "for compatible recreational uses" as required by Policy 1.2, at any price. Because the impact on small boat sailors is so great, the DEIR should be changed to add dry storage. Dry storage was requested by the Sierra Club in a October 4, 2005 letter to the Board of Supervisors which repeated many previous requests, by the writer, during the project planning process.

A reissue of DEIR, for this alternative, may be necessary because mitigating the loss of small boat slips may be seen by some to have other impacts. Dry storage will not only mitigate the impacts of the loss of small boat slips but will also help meet the requirements of Policy 1.3 "establishing low user costs" because it should be possible to construct dry storage spaces at considerably lower costs than the wet storage slips.

Description of Suggested Dry Storage Alternative:

6. Dry storage is provided, in the Bay Area, by at least, the St. Francis and San Francisco yacht clubs for their members. In Southern California, Dana Point Harbor has a waiting list to rent 540

dry storage slots. This shows that dry storage is desirable, appropriate and financially feasible. Dry storage has boats stored, on a level area on land or fixed pier. This is basically a long term parking lot for boats. The boats are stored on a trailer or cradle provided by the boat owner. The cradle is manually or power assist rolled to a jib crane, with a hoist, located near the waters edge. The jib crane will be on a fixed pier on pilings adjacent to the storage area and the jib arm will extend just far enough over the water to provide water under the keel at low tide. There will be a narrow floating pier alongside the pilings to minimize the length of the crane. Dana Pt. has four ton hoists because it is only required to handle boats shorter than 25 feet. Most boats will be equipped with fittings through bolted to the keel, to which, an owner provided cable system can be simply attached to a hook lowered from the crane. The process of connecting the hook, lifting the boat from the cradle, lowering it to the water and disconnecting the hook only takes minutes and crew from other boats, waiting for the crane, often help to speed the process. The boat is then moved to a wider pier for final rigging. This pier is directly connected to the narrow pier and connected to the upper pier with a tide adjustable ramp to provide disabled access.

All of the above can be located adjacent to the East Harbor and use the parking lot just west of the entrance to Fort Mason for the level dry storage area. The boats will be able to turn alongside the pier and easily exit in the open water space provided for larger boats access to slips in the water, as proposed by the subject renovation. If the crane is located near the eastern end of this water space, even boats without motors will be able to access the crane to leave the Bay. This area could accommodate about 160 small boats with space allowed for transit, sidewalks, trucks and auto access to Fort Mason and fuel deliveries to City Yachts.

Transportation Impacts Caused by Dry Storage:

These issues should be discussed as part of the dry storage alternative.

7. Currently the Muni 28 line route runs to the north on Buchanan Street and drives through a Marina parking lot to a terminal in Fort Mason. The 28 leaves Fort Mason and goes through the parking lot to Buchanan to go east on Marina Boulevard to make a right turn on Laguna Street. The route could be changed to enter the parking lot at Laguna and then enter Fort Mason to its terminal. The bus could exit Fort Mason and immediately turn left to Laguna. There are existing traffic signals on the intersection of Laguna and Marina Boulevard which could be modified to allow Muni and other traffic to Fort Mason to use this new entrance. This would shorten the Muni route by eliminating two jogs. In addition a signal change will be necessary to allow Muni to cross Bay Street to proceed north on Laguna Street.

8. There is a proposal to extend the Muni 'F' trolley from Fisherman's Wharf through a tunnel under Fort Mason which daylight just south of the automobile entrance to Fort Mason. This will require detailed study before funding is found for this proposal. But, an early alternative had the trolley looping through the parking lot back to the tunnel. We suggest instead a rail route which has a single track running from the tunnel to the north bound curb lane of Marina Boulevard with a return loop at the Buchanan Street entrance to the Marina parking lot. The rail near the curb on Marina Boulevard would operate with two way traffic and this would require the elimination of some parking and a separation from opposing auto traffic.

9. The loss of parking spaces will be decreed by some, but the Planning Department has long and properly held that a "parking shortage" is not an environmental impact. Transit is available to

replace any "need" for parking and anecdotal observation indicates that most of the parking is utilized by long term commuters, which is not in accordance with City policy.

The Sierra Club has worked for many years to help preserve San Francisco Bay for wild life and similar to the City Open Space Element for human recreational users too. Please don't forget small boats. We will be pleased to work with you to resolve any additional impacts of dry storage.

Very truly yours,

Howard Strassner

Howard Strassner, Chair Transportation Committee

419 Vicente, San Francisco CA 94116, 661-8786, (h.w.fx)
email: ruthow@dslexreme.com

CC: Supervisor Alioto-Pier, Yomi Agunbiade, RPD Fax 221-8034



RECEIVED
JAN 20 2006
BY:

January 17, 2006

Mr. Paul Maltzer
Planning Department
City and County of San Francisco
1660 Mission Street, Suite 500
San Francisco, CA 94103

RE: San Francisco Marina Renovation Project Draft Environmental Impact Report (DEIR)

Dear Mr. Maltzer:

This letter supports the written comments of Brian O'Neill, General Superintendent of The Golden Gate National Recreation Area (GGNRA) on the environmental analysis for the San Francisco Marina Yacht Harbor Renovation (Project) as contained in the Draft Environmental Impact Report issued on September 6, 2005.

Given the incomplete nature of the study, especially in regards to assessment of potential impacts to Pier 1, Fort Mason Foundation requests that the Planning Commission not certify the DEIR as presented, and that the East Breakwater be designed and constructed simultaneously with structural improvements of Pier 1.

We commend the City of San Francisco for the manner in which it has begun to address potential impacts to Fort Mason through establishment of design guidelines for new elements to be constructed in the area.

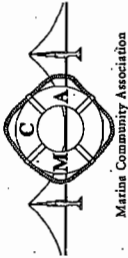
If you have any questions, please contact Suzanne Lifson, Director of Client Services (415) 347-7510. Thank you for the opportunity to comment on the proposed project. Please provide us with a copy of the Final EIR when complete.

Sincerely,

Alexander Zwisler
Executive Director

Cc: Brian O'Neill, General Superintendent, GGNRA

FORT MASON FOUNDATION
Landmark Building A, Fort Mason Center, San Francisco, CA 94123-1382



Marina Community Association

COMMENTS ON THE

DRAFT ENVIRONMENTAL IMPACT REPORT

FOR THE

SAN FRANCISCO MARINA RENOVATION PROJECT

PLANNING DEPARTMENT CASE NO. 2002.1129E

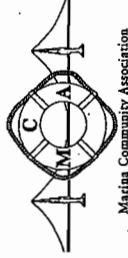
PREPARED BY THE

MARINA COMMUNITY ASSOCIATION

FOR

SAN FRANCISCO PLANNING DEPARTMENT

Marina Community Association, 1517 North Point, #531, San Francisco, CA 94123
Phone: 415-436-4164 e-mail: marina.94123@sbcglobal.net Fax: 415-436-4164



Marina Community Association

January 18, 2006

Ms. Lisa Gibson
Environmental Coordinator
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco
CA 94103

Re: Draft Environmental Impact Report
For the San Francisco Marina Renovation Project
Planning Department Case No. 2002.1129E

Dear Ms. Gibson,

These comments on the Draft Environmental Impact Report (DEIR) for the San Francisco Marina Renovation Project are submitted on behalf of the Marina Community Association, as well as those individuals identified in Appendix A to these comments (see attached). We request that they be included in the proposed "Comments and Responses" document, and also respectfully request that they be considered by the Planning Commission in its further review of this project.

The comments are divided into the following sections:

- The preparation of this DEIR was a violation of the San Francisco Administrative Code.
- The boundaries of the project were incorrectly set, ignoring impacts on adjacent parcels.
- The seismic condition of the Sea Walls and St. Francis Spit was not taken into account.
- Reasonable alternatives were ignored.
- The sponsor's objectives are based on faulty data, giving rise to unnecessary construction.
- The proposed construction of the East Harbor maintenance building is unnecessary and would violate several City codes.
- The proposed expansion of the East Harbor restrooms should be re-located to the waterside.
- The proposed East Harbor trailer boat storage ignores the cumulative impact of other proposed projects.
- The economic and social effects of the project have been ignored.

Marina Community Association, 1517 North Point, #531, San Francisco, CA 94123
Phone: 415-436-4164 e-mail: marina.94123@sbcglobal.net Fax: 415-436-4164

THE PREPARATION OF THIS DEIR WAS A VIOLATION OF THE SAN FRANCISCO ADMINISTRATIVE CODE.

On January 12, 2006 the San Francisco Budget Analyst issued a "Management Audit of the Recreation and Park (sic) Department". On page 121 of that report the Budget Analyst states:

"A resolution adopting findings that the Marina Yacht Harbor renovation is fiscally feasible is pending before the Board of Supervisors. Board of Supervisors' approval of the proposed resolution is necessary for completion of the Environmental Impact Report. The draft Environmental Impact Report was heard before the Planning Commission on October 28, 2005, but has not yet been approved. According to the Recreation and Park Department, the Department expects Planning Commission approval of the draft Environmental Impact Report and to calendar the resolution adopting findings that the Marina Yacht Harbor renovation project is fiscally feasible for Board of Supervisors' approval in January 2006."

That statement by the Budget Analyst explains that the EIR cannot be approved without a finding of fiscal feasibility, and conversely that a finding of fiscal feasibility cannot be made until the EIR is approved. This conundrum exists because the Recreation and Parks Department started this EIR in violation of Chapter 29 of the San Francisco Administrative Code and now expects the Planning Commission to solve the conundrum by approving an illegally prepared DEIR.

Chapter 29 of the code was clearly designed to prevent the expenditure of public money on an environmental impact report, until the Board of Supervisors has determined that the proposed project is fiscally feasible and responsible. Section 29.7 originally required any proposed project that had not completed environmental review as of January 27, 2004 be required to suspend the review. Section 29.7 was amended on July 19, 2005 to allow such reviews to continue, provided that the project sponsor submitted to the Board of Supervisors, within 30 days of effective date of the ordinance, the materials required for a determination of fiscal feasibility.

In order to understand why the preparation of this DEIR violates Chapter 29 it is necessary to understand the following sequence of events concerning the project.

December 27, 2003 Preliminary Mitigated Negative Declaration ("PMND") published.

January 27, 2004 Chapter 29 of Administrative Code passed.

February 9, 2004 Notice of Appeal filed concerning the PMND.

January 14, 2005 Nadia Sessy of the Mayor's Office of Finance advised the Marina Harbor Working Group that a fee increase schedule that includes a 37% increase in fiscal year 2011 is necessary to make the renovation project fiscally feasible and financially responsible.

February 17, 2005 Recreation and Parks Commission passed a resolution to recommend a fee increase schedule to the Board of Supervisors, which schedule included a 37% fee increase in fiscal year 2011.

March 3, 2005 Nadia Sessy of the Mayor's Office of Finance repeated her original advice to Marina Harbor Working Group that a fee increase of 37% in fiscal year 2011 is necessary to make the project fiscally feasible and responsible.

March 19, 2005 Notice of Preparation of Environmental Impact Report.

June 2, 2005 The Budget Analyst reported to the Budget & Finance Subcommittee that he was instructed by the City Attorney that a 37% fee increase for the Marina in fiscal year 2011, which is required to make the project fiscally feasible and financially responsible, cannot be proposed until after completion of the Environmental Impact Report.

June 16, 2005 Fee Increase schedule for Marina approved by Budget & Finance Subcommittee, without the 37% increase in 2011.

June 16, 2005 Resolution adopting findings that the Marina project is fiscally feasible and financially responsible was originally presented to the Budget & Finance Subcommittee, but then withdrawn.

July 12, 2005 Fee Increase schedule for Marina passed by Board of Supervisors, without the 37% increase in 2011.

July 19, 2005 Section 29.7 amended in an apparently transparent attempt to retroactively cover the Marina Environmental Impact Report.

September 6, 2005 Draft Environmental Impact Report published.

October 13, 2005 Resolution adopting findings that the Marina project is fiscally feasible and financially responsible was scheduled to be presented to the Budget & Finance Subcommittee, but again withdrawn

Thus we find ourselves in a situation where the DEIR was started in March 2005 in direct violation of Chapter 29. The attempt to retroactively correct this problem by amending Section 29.7 does not correct the problem because the Board of Supervisors has been told by the Budget

Analyst and the Mayor's Office of Finance that the approved fee schedule enacted by the Mayor
does not make the project financially feasible or fiscally responsible. 1.1
cont

On page 15 of the Budget Analyst's January 12, 2006 cover letter to the Board of
Supervisors, transmitting the Management Audit Report of the Recreation and Parks
Department, he states:

"...renovating the East Harbor may not be fiscally feasible because (a) California
Department of Boating and Waterways funding for the East Harbor renovation is
uncertain and (b) East Harbor dredging costs, due to contaminated soil, could range from
\$2.8 million to \$7.6 million."

In section 7 of his Audit Report the Budget Analyst states that the Recreation and Parks
department should:

"Evaluate the West Harbor's fiscal feasibility, in the absence of renovating the East
Harbor..."

Chapter 29 requires that the evaluation be done before money is spent on an EIR, but the
Recreation and Parks Department has so far spent over \$300,000 of public money without such
an evaluation. The Department now expects the Planning Commission to retroactively correct its
mistake by approving this DEIR. We urge the Commission not to become party to this
subterfuge. Further, the lack of fiscal feasibility will have economic and social effects for the
City, which should be considered according to CEQA section 15131. These are described more
fully in a later section of these comments.

THE BOUNDARIES OF THE PROJECT WERE INCORRECTLY SET, IGNORING IMPACTS ON ADJACENT PARCELS

The original EIR application submitted by the Recreation and Parks Department to the
Planning Department described the project area as:

"San Francisco Marina including East Harbor, West Harbor and Marina Green, Marina
Boulevard between Lyon Street and Laguna Street" (emphasis added)

In a letter dated 26 September 2003 to their consultants Environmental Science
Associates, who wrote the PMND, the Planning Staff directed the consultants to delete the
Marina Green from the project site boundaries, stating:

"Limiting the project site boundaries in such a manner would reduce the public
perception that proposed improvements are more geographically extensive than they
actually would be."

The DEIR (see page S-1) states that:

"The West Harbor is generally bounded by Marina Boulevard and the western end of the
Marina Green to the south, Yacht Road and the outer jetty to the north..."

"The East Harboris bound (sic) by Beach Street to the south, San Francisco Bay to
the north, Lower Fort Mason to the east, and Marina Boulevard and Webster Street to the
west."

Thus the boundaries of the project, as defined by the DEIR itself, clearly include the sea
walls, the St. Francis Spit and the Marina Green. Two of the three proposed new breakwaters
would attach to the St. Francis Spit and the Fair Sea Wall. Access to the proposed new Harbor
Master's office could only be attained by use of the Marina Green.

The DEIR (see page S-2, footnote 2) states that there is no legal definition of the Marina
Green boundaries, but then goes on to say that the parkland areas east of Webster Street are not
considered part of the Marina Green. To the contrary, that parkland area is considered by those
who live in the area, and those who use it for recreation, to be part of the Marina Green.

The California Environmental Quality Act ("CEQA") requires that effects on adjacent
sites be evaluated. The DEIR recognizes that the Fair Sea Wall and the Marina Green have
"historic significance" (see DEIR pages III.C-4 and III.C-5), but they have been deliberately
excluded from the project. The sea walls and the St. Francis Spit are not just in the general
vicinity of the proposed project, they form the southern and northern boundaries of the harbor,
and the proposed breakwaters of the project will be attached to them. To exclude the sea walls,
the St. Francis Spit and the Marina Green from the project scope makes no logical or economic
sense, and is a violation of CEQA. The project boundaries have been deliberately set to start one
inch north of the sea walls and one inch south of the St. Francis Spit, presumably to avoid
dealing with the problem that is described in the following section.

THE SEISMIC CONDITION OF SEA WALLS AND ST. FRANCIS SPIT WAS NOT TAKEN INTO ACCOUNT

The sea walls form the southern boundary of the west harbor, and the St. Francis Spit
forms the northern boundary. The proposed new breakwaters would attach to them, but the
project has ignored the need to renovate the sea walls and the spit. No commercial lender would
finance the subject project without requiring the sea walls and the St. Francis Spit to be
retrofitted (see California Harbor & Navigation Code Section 71.4 (b)).

As stated in the DEIR (see page S-12), the California Seismic Hazards Mapping Act
(Public Resources Code Section 2690 et seq.) and the San Francisco Building Code (Section
1804.5) require a geotechnical investigation and report to be prepared for new or renovated

buildings in liquefaction zones. No such report has been prepared. Among the reasons given for that lack of such a report are (see DEIR page S-12):

6.3
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cont

"...renovation plans have not been finalized..."

"However, because the design of the project has not been finalized, damage to the seawall could occur." (emphasis added.)

There are several studies and reports that were prepared concerning the Marina District following the 1989 Loma Prieta earthquake. Among these are:

"Final Report - Liquefaction Study - Marina District", July 1991 prepared for the City & County of San Francisco" (see DEIR Appendix A, page 77)

"The Loma Prieta, California, Earthquake of October 17, 1989 - Marina District" U.S. Geological Survey Professional Paper 1551-F.

Among the findings of these reports are:

- The Fair Sea Wall might move 4 to 8 ft. towards the Bay in a future major earthquake.
- The Marina Boulevard Sea Wall might move toward the Bay in a future major earthquake.
- The St. Francis Spit might move 5 ft. in a future major earthquake.
- In the 1989 earthquake the Fair Sea Wall settled up to 1 ft. and a crack several inches wide formed behind it for a length of 50 ft.
- In the 1989 earthquake the Marina Boulevard Sea Wall was damaged due to lateral movement and settled up to 2 ft.
- In the 1989 earthquake the St. Francis Spit moved 2 ft. laterally and settled nearly 1 ft.

The current condition of the St. Francis Spit is so bad that sand is "leaking" under the spit into the outer west harbor. The sand is engulfing the docks of the Golden Gate Yacht Club. In May 2005 the outer west harbor was dredged in order to remove this sand. By November 2005, the Golden Gate Yacht Club docks were again unusable.

If the St. Francis spit is not repaired, the proposed project will not be able to use many of the proposed berths in the outer west harbor. That will have a dramatic effect on the economics of the project, which have yet to be found to be financially sound without this problem (see above).

The DEIR proposes to attach new breakwaters to the Fair Sea Wall & the St. Francis Spit; yet the wall and the spit are not considered part of the project. Attaching the new breakwaters may

stabilize a small part of the wall and spit, allowing the rest to move about the breakwaters and increase the chance of major damage.

The DEIR now plans to spend \$40 million to attach a renovated harbor and new breakwaters to sea walls that might collapse. Adding the new breakwaters might increase the chance of damage to the sea walls. The DEIR admits its design is still only conceptual, and does not know what will happen to the sea walls.

The DEIR dismisses the findings of the two reports noted above but a places heavy reliance on a report prepared by Treadwell and Rollo in 1997 to support the proposition that:

"... the City could choose to repair the seawall, utilities, and sidewalk/jogging path behind the seawall after an earthquake" (see DEIR page S-12).

That is the type of forward looking emergency planning that would have made the City of New Orleans proud in the recent Katrina disaster. Coincidentally, Treadwell and Rollo was the consulting firm hired to work with Moffat & Nichol on the Marina Renovation Project and thus has a vested interest in seeing this project proceed as proposed. At a Planning Commission Hearing on January 12, 2006, Mr. Rollo testified that, in a major earthquake, the Marina Boulevard Sea Wall might topple into the Bay.

After the Loma Prieta earthquake in 1989 the City Fire Department installed drafting fire hydrants along the waterfront. These are physically attached to the sea walls, and Appendix C to these comments shows hydrants attached to the Marina Boulevard Sea Wall. Others attach to the Fair Sea Wall. If the sea walls were to collapse in a future major earthquake, as Mr. Rollo testified, these hydrants may be rendered useless. That may result in more fires and loss of life. At that point Mr. Rollo's suggestion of just re-building them after they fall down may not seem like such a good idea.

6.6

The hazardous seismic condition of the Fair Sea Wall is recognized in the DEIR, when discussing the renovation of the former Degaussing Station, which is proposed for use as the Harbor Office. The Degaussing Station was built by the US Navy in 1951 under a special use permit granted by the City. The permit required the Navy to demolish the building when it was no longer needed. In 1998 the Recreation and Parks Department allowed the Navy to abandon the Degaussing Station without fulfilling the commitment to demolish it. It obstructs views of the Bay and obstructs the public promenade, and should be demolished.

The Degaussing Station sits on top of the Fair's sea wall. On page III.D-10 the DEIR states:

"...reoccupancy of this building under the proposed project could expose people who would otherwise not utilize this building to a seismic hazard. Without mitigation, this impact would be potentially significant."

On the same page it is suggested that there should be a report prepared that:

6.7

"... would identify measures to reduce seismic hazards to an acceptable level."
 The promoters of this project apparently believe it is appropriate to spend money to protect the Harbor Master, but not the public who may be walking on the same wall or the boat owners on whom the wall may collapse.

The costs to repair the sea walls can be easily estimated, and could be found by reducing other unnecessary parts of the project. In the 1991 reports the cost estimates for retrofitting the sea walls and spit were:

Fair Sea Wall	\$1.8 million
Marina Boulevard Sea Wall	\$310,000
St. Francis Spit	\$2.1 million

REASONABLE ALTERNATIVES WERE IGNORED

The alternatives to the proposed project that were considered in the DEIR were (see section VI):

1. No project.
2. No new west harbor breakwaters.
3. West harbor renovation only.
4. Removal of the former degaussing station and expansion of the harbor office.

A reasonable alternative that should have been considered is to repair and replace the docks, slips, moorings and pilings without changing the configuration of the harbors, without building new breakwaters, and without erecting new buildings in waterfront park space. This alternative would achieve the sponsor's primary objective with much less environmental risk and at a much lower cost.

Some cost estimates sent by Ms. Petrucione of the Recreation and Parks Department to Supervisor Armiano on 29 July 2005 contain the following items.

West Harbor Breakwater	\$1,403,000
Mole Removal	\$ 727,000
East Harbor Breakwater	\$2,063,000
East Harbor Restroom Expansion & Renovation of Degaussing Station	<u>\$2,340,000</u>
TOTAL	\$6,533,000

With a construction contingency of 10% these estimates amount to over \$7million. That does not include any savings in the estimated \$8,324,000 for floating dock replacement that would be realized if the average berth lengths were not increased (see below).

The savings of over \$7 million would provide much of money estimated in 1991 as the cost of retrofitting the sea walls and the St. Francis Spit, even when inflated to 2006 prices.

Appendix B to this letter contains a list of signatures of San Francisco residents who support this repair and replace alternative.

THE SPONSOR'S OBJECTIVES ARE BASED ON FAULTY DATA, GIVING RISE TO UNNECESSARY CONSTRUCTION

Among the sponsor's objectives listed on page II-12 of the DEIR is:

"Provide a slip-size distribution that more closely matches market demand."

This is expanded on page II-13 to cite a 2002 study by Moffatt & Nichol that alleges that there is:

"a recent shift toward the ownership of larger boats", and that

"approximately 85 % of the more than 500 boaters on the marina waiting list desire slips greater than 30 feet in length".

Neither of those statements turns out to be correct, but the objective which they are claimed to support results in a significant re-configuration of the harbor and a significant increase of the cost of the project.

There are more objective sources of data concerning the berth size distribution and demand that show quite different results.

Appendix D to this letter is a chart prepared by the Marina Community Association. It compares the boat sizes of the actual existing tenants of the harbor (blue), with the berth sizes proposed by the renovation (red). Appendix D shows that most existing tenants have boats in the 25 to 30 foot lengths, while the project proposes primarily 35 to 40 feet.

To test the above statement in the DEIR concerning the waiting list, the Marina Community Association prepared Appendix E to this letter. Appendix E is similar to Appendix C, but adds those boaters that are on the waiting list. Appendix E confirms that the majority of boaters have 25 to 30 foot boats, not the 35 to 40 feet proposed.

To confirm the accuracy of Appendices D & E, we compared them with an independent study commissioned by the State Department of Boating and Waterways ("DBW") in October 2002. Appendix F to this letter is a chart that summarizes data from the October 2002 DBW

study. This chart shows that the DBW projections for San Francisco Bay through the year 2020 show no increase in demand for boats exceeding 26 feet. In fact, the study projects a slight decline. Appendix F also shows that there has been no significant change in demand for berths over 26 feet since 1985.

It is worth remembering that Moffatt & Nichol, the firm that produced the berth size distribution study relied on in the DEIR, has been consulting on this renovation project for years and has a vested interest in making the project as large as possible. A simple repair and replace of the existing configuration would result in lower consulting fees to Moffatt & Nichol.

EAST HARBOR MAINTENANCE BUILDING IS UNNECESSARY AND WOULD VIOLATE SEVERAL CITY CODES

The project plans to construct a 1,000 square foot maintenance building in the center of the only open green area in the East Harbor, dividing it into two smaller, less useful areas. Yet the DEIR states (see page S-4):

"...there would be no change to the existing variety of recreational and open space uses..."

"...the proposed project would not disrupt or divide the physical arrangements of existing uses or activities..."

The proposed maintenance building is not in compliance with Section 101.1 (b) (8) of the City Planning Code which requires "that our parks and open space and their access to sunlight and vistas be protected from development".

The proposed maintenance building is not in compliance with the City Master Plan Element concerning Recreation and Open Space (Part 2), which sets as an objective to "maintain the quality and character of the Marina Green" from the Presidio to Gas House Cove.

The proposed maintenance building is not in compliance with the City Plan Element regarding Recreation and Open Space (Policy 2.2), which states that "it is essential that the City preserve the public open space which remains".

The proposed maintenance building is not in compliance with the City Plan Element regarding Environmental Protection Element (Policy 3.2) which is to "Promote the use and development of shoreline areas consistent with the Master Plan and the best interest of San Francisco".

The proposed maintenance building is not in compliance with the City Plan Element regarding Urban Design (Policy 1.1) which requires developers to "Recognize and protect major views in the city, with particular attention to those of open space and water".

The proposed maintenance building is not in compliance with the City Plan Element regarding Urban Design (Policy 3.2) which requires developers to "Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance".
The DEIR states (at page III.B-8) that:

"...the proposed location of the maintenance building in front of tall trees and adjacent to existing structures would not substantially degrade or obstruct any scenic view now observed from public viewpoints. The view is partially obstructed under existing conditions, and under project conditions the trees and other buildings adjacent to the maintenance building would continue to obstruct views of Tiburon and the Marin Headlands in the distance, though the view blockage would be slightly greater due to the new maintenance building".

It is not appropriate to judge visual impact by measuring the footprint of a building. In an attempt to justify the statement that the view blockage would only be slightly greater, the DEIR (at page III.A-10) purports to calculate the percentage by which the footprint of the new building will reduce the open space in the East Harbor. Firstly, the calculation is arithmetically wrong. The correct answer is 2% - not 0.02% as quoted. One can only hope that the arithmetic in other parts of the DEIR is more accurate. But measuring the visual impact by calculating the square footage used by the building would only be relevant if you were in a helicopter and viewing it from above.

It would be more appropriate to measure the visual impact from the viewpoint that will be most often seen by the public. A much better assessment of the visual impact is given by the DEIR on page III.B-9, which shows the existing and proposed views from Marina Boulevard. This is the view that most visitors to the Marina Green will see, as they walk along Marina Boulevard.

The photographs on page III.B-9 enable one to calculate the amount by which the proposed building will increase the obscuring of the views. The amount obscured by the proposed building in the lower photograph is 525% higher than the current view - not 0.02% as falsely implied by the DEIR.

The statement on page III.B-8 above also implies that, as the current view is partially obscured by trees, having it obscured by a building is no worse. Is open space controlled by the Recreation and Parks Commission not better filled with trees rather than buildings, even if the trees partially obscure the view of the Bay?

Is it necessary to place the proposed building in the center of the East Harbor open space? The DEIR also does not take into account that the proposed building would sit right in the middle of the only open space in the East Harbor, dividing it into two smaller, less attractive areas. The existing restroom building is sited on the edge of the space abutting the parking lot, and does not divide the space, as would the proposed maintenance building.

3.2
cont

The siting of the proposed building will interfere with recreational uses of the open space. The space is presently used by families with young children; young adults playing games that require open space, and senior citizens exercising. Is a maintenance building in the middle of the space compatible with these uses?

The DEIR does not consider that a driveway to the building will be necessary for maintenance trucks that are likely to be parked much of the time next to the building. The coming, going and parking of vehicles on the open space will make it dangerous for children.

There is a question concerning whether the proposed maintenance building is even necessary at all. The DEIR (at page S-3) states that:

"With the construction of the new maintenance building for material storage, the Recreation and Park Department would no longer use the existing 1,500 square foot SFPUC pump station in the West Harbor, which would remain unoccupied" (emphasis added).

The DEIR (at page III.A-9) confirms that the SFPUC building, which is currently used for maintenance, "would remain vacant" (emphasis added.)

2.5

Why should the City spend public money to build a maintenance building, when the building it currently uses for the purpose is 50% larger, located just as conveniently, and will be left vacant if the new building is erected? Why should the City build a maintenance building that will obscure views of the Bay, make good park space unusable, and create danger for children when the building it currently uses for the purpose is 50% larger, located just as conveniently, and will be left vacant if the new building is erected? Why should the City build a maintenance building when the existing SFPUC building has easy access from Yacht Road and would not require vehicles to drive on what is currently open, park space?

EAST HARBOR PUBLIC RESTROOMS

The Draft EIR proposes a 600 square foot expansion of the East Harbor public restrooms to provide shower facilities for harbor tenants (see page S-3).

If showers are necessary for tenants at the East Harbor, they should be located within the confines of the Waterside Improvements where they will serve their intended users, and not create a public nuisance.

3.5

The East Harbor parking area is already used illegally by people in recreational vehicles who park overnight and some who are living in the parking area. If the showers are placed adjacent to the existing bathrooms, that will encourage more recreational vehicles to park illegally overnight.

The Draft EIR should consider the implications for the local neighborhood of the Board of Supervisors' Resolution requiring that all city restroom facilities be open to the public 24 hours per day to help homeless persons. A quiet residential neighborhood is not an appropriate place for a public bathroom. The location of the proposed maintenance building would hide the bathrooms from the street and create an environment that could encourage crime.

EAST HARBOR TRAILER BOAT STORAGE

9.6

The DEIR (at page S-4) proposes using 13,600 square feet of the East Harbor parking area for the storage of 24 boats on trailers. On page III.B-7 the DEIR discusses proposed plans to extend the Muni E-line through the tunnel under Fort Mason, with a turn around at the end of the tunnel - possibly on the East Harbor parking area. Sufficient consideration not been given to the fact that the E-line turn around could use space planned for the trailer boat storage.

ECONOMIC CONSIDERATIONS

CEQA Section 15064 (c) states:

"Economic or social changes may be used ... to determine that a physical change shall be regarded as a significant effect on the environment."

"If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant."

In *Citizens Association for the Sensible Development of Bishop Area v. Inyo (1985) 172 Cal. App. 3d 151*

the court held that

"... economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment."

As stated earlier in this letter, the City's Budget Analyst and the Mayor's Office of Public Finance have both found that the proposed project is not fiscally feasible with the fee increases currently authorized by the Board of Supervisors. If the fees paid by the harbor tenants are not sufficient to cover the operation of the marina and the debt service on the DBW loan, then the burden may fall on the general tax payer in San Francisco.

Appendices E and F show that the proposed berth-size distribution will force existing boat owners to pay for larger berths than they need, or leave the harbor. A study performed by the Marina Community Association considered what would happen if existing tenants were allowed to pay only for the berth-size they currently need, not for the larger berths proposed. The study showed that would reduce the revenues for the proposed harbor by about \$750,000 per year. This loss would be on top of the findings that the project is already not financially feasible.

These economic effects would be further aggravated if the seismic renovation of the sea walls and the spit were not done, and then the harbor was damaged by an earthquake. The DBW loan requires that the harbor and its revenue be pledged as collateral for the loan. Damage by an earthquake could close part or all of the harbor, thus reducing revenue and removing some of the collateral for the loan.

If there is any temptation to trust that the Recreation and Parks Department might make economic sense of this project, despite all the analyses to the contrary, it is worth considering the January 12, 2006 Management Audit of the Department performed by the Board of Supervisor's Budget Analyst. The audit found "slipshod fiscal practices" and "inadequate management oversight in many of the Recreation and Parks Department's key functions."

It is all too likely that the proposed renovation of the Marina Yacht Harbor will follow the example of the recent renovation of the Harding Park Golf Course. That project was \$7.6 million, or 47% over budget. The Recreation and Parks Department tapped State Bond Funds that were earmarked for projects in economically disadvantaged areas to pay for the golf course. So far the Department has only made \$490,000 of interest payments on the State Funds. The golf courses have had to be subsidized by \$536,000 from the City's general fund.

The financial analyses performed to date on the Marina project give every indication that a similar problem will occur. If that does happen, it will violate the terms of the DBW loan. Approximately half of the harbor tenants are not residents of San Francisco. Allowing this project to proceed as proposed may well result in the City using general funds that should be spent in disadvantaged areas to subsidize a harbor used by wealthy boat owners who do not even live in San Francisco. That is an "economic and social effect" as described in CEQA section 15131.

1.1

SUMMARY

The DEIR for this project should not be approved for the following reasons.

1. The boundaries are deliberately set to ignore the impacts on adjacent parcels that have historic significance.
2. The DEIR seriously underestimates the impact on the harbor of the seismic condition of the sea walls and spit, and this puts the public at risk.

3. The simple and less expensive "repair and replace" alternative was ignored.
4. The objective of increasing the berth sizes in the harbor is based on incorrect data, and results in more cost and more environmental impact than necessary.
5. The proposed maintenance building on the East Marina Green would violate several City codes, and is not needed.
6. The proposed East Harbor public restrooms should be moved to the waterside.
7. Insufficient consideration has been given to the impact of the proposed MUNI E-line turn around on the proposed East Harbor trailer boat storage.
8. The project is not financially responsible and would have a negative economic and social effect on the City, in violation of CEQA section 15064.
9. The DEIR was prepared in violation of City Law and the Recreation and Parks Department wants the Planning Commission to retroactively correct that problem.

Respectfully submitted,



Alan Silverman

President

Attachment A

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JOINER IN LETTER OF COMMENTS SUBMITTED BY THE
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DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SAN FRANCISCO
MARINA RENOVATION PROJECT (CASE NO. 2002.1129E)

The individual named below wishes to join in the comments submitted to the Planning Commission by the Marina Community Association in January, 2006, and agrees with those comments.


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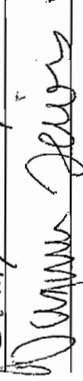
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Phone: 415-346-4164 e-mail: marina.94123@sbcglobal.net Fax: 415-346-4184

JOINER IN LETTER OF COMMENTS SUBMITTED BY THE
MARINA COMMUNITY ASSOCIATION CONCERNING THE
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SAN FRANCISCO
MARINA RENOVATION PROJECT (CASE NO. 2002.1129E)

The individual named below wishes to join in the comments submitted to the Planning Commission by the Marina Community Association in January 2006, and agrees with those comments.

NAME (print):

Kit Haskell

ADDRESS:

3120 FRANKLIN ST #3

SF 94123

PHONE:

415/673-4116

FAX:

E-MAIL:

kyd@peabell.net

SIGNATURE:

Kit Haskell

DATE:

1/16/06

MARINA COMMUNITY ASSOCIATION
1517 North Point, # 531
San Francisco
CA 94123

Phone: 415-346-4164 e-mail: marina.94123@sbcglobal.net Fax: 415-346-4184

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MARINA RENOVATION PROJECT (CASE NO. 2002.1129E)

The individual named below wishes to join in the comments submitted to the Planning Commission by the Marina Community Association in January 2006, and agrees with those comments.

NAME (print):

Lisa Ligon

ADDRESS:

1355 Bay Street #6

San Francisco, CA 94123

PHONE:


415-515-0445

FAX:

E-MAIL:

lisa.2468.sf@yahoo.com

SIGNATURE:



DATE:

1/16/06

MARINA COMMUNITY ASSOCIATION
1517 North Point, # 531
San Francisco
CA 94123

Phone: 415-346-4164 e-mail: marina.94123@sbcglobal.net Fax: 415-346-4184

Attachment B

JOINER IN LETTER OF COMMENTS SUBMITTED BY THE
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MARINA RENOVATION PROJECT (CASE NO. 2002.1129E)

The individual named below wishes to join in the comments submitted to the Planning Commission by the Marina Community Association in January 2006, and agrees with those comments.

NAME (print): CRYSTAL BROWN

ADDRESS: 3532 WEBSTER ST
SF, CA 94123

PHONE: 415-929-9329

FAX: _____

E-MAIL: crystalbrown@yahoo.com

SIGNATURE: *Crystal for*

DATE: 1/16/2006

PETITION TO SAVE THE MARINA

We, the undersigned residents of San Francisco, urge the City and County of San Francisco Recreation and Park Commission, the Planning Commission and the Board of Supervisors to preserve the character of the City Park known as the "San Francisco Marina". The "San Francisco Marina" is defined to include the Small Craft Harbor and the landside elements North of Marina Blvd, bound to the West by the Presidio and to the East by Fort Mason.

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By signing this petition, we are stating that we are **AGAINST commercial charter boat and cruise activity** in the San Francisco Marina and request that any commercial dock fee legislation for such activity be repealed and commercial activity by individual harbor tenant or other entities be halted immediately.

NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
Ari Goldyne	1710 Cliff Dr - Santa Barbara	93109			<i>Ari Goldyne</i>
Matthew Brenner	59 Rockrose Way	94945			<i>Matthew Brenner</i>
Peter Rosenthal	3734 Broderick	94123	816-4416	PeterRosenthal@starboard.net	<i>Peter Rosenthal</i>
Marc E. Goldyne	221 Marina Blvd	94123	929-9121	mgdyne@aol.com	<i>Marc E. Goldyne</i>
Muel Goldyne	3466 Jackson	94118	563-7741		<i>Muel Goldyne</i>
David Harris	1495-A Masonic Ave	94117	861-1224	FITDHS@pacbell.net	<i>David Harris</i>
Irving J. Arctsky	3111 Jackson St	94115	922-7609	ITZ@pacbell.net	<i>Irving J. Arctsky</i>
David Wilk	2009 California	94109	3591965	WilkDavid@hotmail.com	<i>David Wilk</i>
Peter Levine	1890 Yosemite Rd - Berkeley	94707	510-528-3090		<i>Peter Levine</i>
Anne Levine	1890 Yosemite Rd, Berkeley	94707	510-528-3090		<i>Anne Levine</i>
Jean Palmer	P.O. Box 99, Sausalito, CA	94965	415-377-90		<i>Jean Palmer</i>
Serena Brenner	59 Rockrose Way	94945			<i>Serena Brenner</i>
GAIL GOLDYNE	221 Marina Blvd	94123	929-9121	GailGoldyne@aol.com	<i>Gail Goldyne</i>
SUE CHANG	55 CASA Way	94123	440-7746		<i>Sue Chang</i>

*REQUIRED

THANK YOU FOR HELPING TO PRESERVE THE MARINA!

a Peter@Starboard.net.com

PETITION TO SAVE THE MARINA

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
ASHLEY WESSINGER	575 MARINA BLVD	94123	415-285-2425	ashtewessinger@gmail.com	<i>Ashley Wessinger</i>
SHERI NEHER	3200 BEACH ST.	94133	770-0486	sheri.neher@scripsal.net	<i>Sheri Neher</i>
LUCIANO GALLINA	3510 Baker St	94123			<i>Luciano Gallina</i>
EDUARDO BARRIET	727 Marina Blvd	94123	415-544-4444	eduardo@scripsal.net	<i>Eduardo Barriet</i>
Claudia Kohl	2443 Francisco St	94123	415-6903	AKMP_BOM@scripsal.net	<i>Claudia Kohl</i>
Gloria Fontanello	1435 Bay St	94123	771-8662	Terry 9222@scripsal.net	<i>Gloria Fontanello</i>
Teresa Fontanello	1435 Bay St	94123	567509	Terry 9222@aol.com	<i>Teresa Fontanello</i>
Jordan Stout	2360 Bay St	94125	806-1193	Kydenby@sbcglobal.net	<i>Jordan Stout</i>
Richard Johnson	40 Rico Way	94123	731-564	dsjohnson@scripsal.net	<i>Richard Johnson</i>
CHRISTOPHER BISHOP	261 CERVANTES	94123	290-7117	500k@sbcglobal.net	<i>Christopher Bishop</i>
CHRIS CHANG	71 Rico Way	94123	922-5620	CBICU99@aol.com	<i>Chris Chang</i>
	55 CASA Way	94123	440-7746		<i>Chris Chang</i>

*REQUIRED

THANK YOU FOR HELPING TO PRESERVE THE MARINA!

PETITION TO SAVE THE MARINA

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
Vincent Ammirato	3109 Franklin St.	94123	94123		<i>[Signature]</i>
Vincent Ammirato	3109 Franklin St.	11	94123		<i>[Signature]</i>
L. Nelson Price	35 CASA	94123	94123		<i>[Signature]</i>
Anne F. Vollen	3740 Divisadero St.	94123	94123		<i>[Signature]</i>
Gary D. Vollen	"	"	94123		<i>[Signature]</i>
MARK WATSON	1262 A STOREY AVE 94129	309-2059	94123	MARK@WATSONANDSON.COM	<i>[Signature]</i>
			94123		
			94123		
			94123		
			94123		
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			94123		
			94123		
			94123		
			94123		

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
Jodi Thirygare	635 8th Ave, SF	94118	386-1645		<i>[Signature]</i>
Suzie Pisman	1441-B Battery Caulfield	94129	752-3734		<i>[Signature]</i>
simone Porto	941 NORTH POINT ST	94109	440-6934		<i>[Signature]</i>
Nataline Chew	486 Marietta Dr SF	94127	245-3697		<i>[Signature]</i>
Michael Jung	219 27th Ave	94121	831-3321		<i>[Signature]</i>
JOHN B. WOLG	254-5th AVE	94118	881-9785		<i>[Signature]</i>
GINA PRINE	1422 Caballo St	94118	933-6062		<i>[Signature]</i>
Yudy Cristo	1381 South Van Ness Ave	94110	285-0857		<i>[Signature]</i>
Sangee Globus	1135 Lake St	94118	221-1375		<i>[Signature]</i>
Reza Zagak	38 Naamanning St Ave	94104	299-2023		<i>[Signature]</i>
Jose A. Lopez Del Prado	480 Warren Ave Apt 408	94131	474-3143		<i>[Signature]</i>
Gina Abrahamson	1949 Chestnut St, Apt 202	94123	434-3335		<i>[Signature]</i>
Abbin Le	141 Sanatoga Ave Apt 504	95051	418-568-0551		<i>[Signature]</i>
Rickes Leys	San Francisco, CA	95051			<i>[Signature]</i>
Balmer	52 Marine Ave	94127	415-731-4235		<i>[Signature]</i>

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PETITION TO SAVE THE MARINA

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
NANCY + MIKE NICHOLS	265 MARINA BLVD.	94123	745-1136	MNICHOLS50@comcast.net	[Signature]
LEONARD DAVIS	2425 FRANCISCO ST.	/	346-7321		[Signature]
KATHLEEN RALDEN JACKSON	821 Marina	94123	771-1112	ktruden@oldcity.com	[Signature]
ELENA BRITAIN	3375 PIERCE ST.	94123	931-1167		[Signature]
PAULA RAGNATORI	3247 BAKER ST.	94123	346-3592		[Signature]
JACULI STEWART	50 WATER ST	94133	352-1760		[Signature]
DAN CLARKE	1625 North Point St SF	94123	775-7773	CLARKEAND@YAHOO.COM	[Signature]
FRANJA PRICE / RICK OHLRICH	67 RICOLWAY	94123	346-4683	carol@ohlrich.com	[Signature]

*REQUIRED

THANK YOU FOR HELPING TO PRESERVE THE MARINA!

819 035

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
THOMAS	4334 18th	94114			[Signature]
Tonyun Fong	4339 18th St. SF, CA	94114			[Signature]
CARLA ALBRIGHT	55 CASA WAY SF, CA	94123		CARLINA@COMCAST.COM	[Signature]
Jayne Nelson	1344 Siltman St	94122			[Signature]
Mike Nelson	1344 Siltman St	94122			[Signature]
Melissa Lee-Gardner	215 22nd Avenue Ave	94121			[Signature]
Frederick Frine	1422 Cabrillo	94118			[Signature]
Carvin Gorg	430 Naples St	94112			[Signature]
Michele Paolini	1005 Hyde CA #3	94109			[Signature]

*REQUIRED

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
Crystal Brown	3532 Webster St	94123	9299329	Crystalbrown@panc	<i>Crystal Brown</i>
Soo y chang	725 Marina Blvd	94123	775 4584		<i>Soo y chang</i>
Esmeralda Juan	715 Marina BLV	94123	921 1982		<i>Esmeralda Juan</i>
KELLY MILLS	725 Marina Blvd	94123		ched.km@pacbell.net	<i>Kelly Mills</i>
BRUCE MUNRO	3487 WASHINGTON	94118	923-1411	Bmunro@thors.org	<i>Bruce Munro</i>
Kathleen McKenna	227 Cervantes	94123		mckennak@earthlink.net	<i>Kathleen McKenna</i>
ERNEST A. LIPPOLD	37 Rico way	94123	342-5749		<i>Ernest A. Lippold</i>
Larry Thompson	3425 Scott	94123			<i>Larry Thompson</i>
Carole Barrett	727 Marina Blvd	94123	440 3585		<i>Carole Barrett</i>
PHILIP DANCEL	1266 - 21 st AVE	94122	601 3674		<i>Philip Dancel</i>

REQUIRED

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
NORMAN C. DURIEX	2551 - 18 th Ave.	94116	415 564 6039	n.duriex@cast.com	<i>Norman C. Durieux</i>
MONIQUE H. DURIEX	2551 - 18 th Ave.	94116	564 6489		<i>Monique Durieux</i>
JACQUELINE M. DURIEX	2551 - 18 th Ave.	94116		jacqueline.22203@yahoo.com	<i>Jacqueline Durieux</i>
Laura Retzlaff	2563 - 18 th Ave	94116			<i>Laura Retzlaff</i>
RALPH H. RETZLAFF	" "	" "	667-1363	rretzlaff@mac.com	<i>Ralph H. Retzlaff</i>
NATHAN RETZLAFF	" "	" "	" "		<i>Nathan Retzlaff</i>
Julia Retzlaff	" "	" "	" "		<i>Julia Retzlaff</i>
JONET V. AVILA	2543 18th Avenue	94116	604-6004	avilaj@prodigy.net	<i>Jonet V. Avila</i>
JOHN F. HARRINGTON	2529 18 th AVE	94116	681-2458		<i>John F. Harrington</i>
NOREEN A. HARRINGTON	2529 - 18 th Ave.	94116	681-2458		<i>Noreen A. Harrington</i>

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
BRIAN DAVIS	702A ASHBURY ST	94117		bcdavis@pivotinteriors.com	<i>Brian Davis</i>
ANNE WAGNER	1120 BROADWAY	94109		awagner@pivotinteriors.com	<i>Anne Wagner</i>
Carrie Clark	2454 Fulton St	94118		cdclark@pivotinteriors.com	<i>Carrie Clark</i>
Seren Trumell	2440 Jones ST	94133		Strumell@Pivotinteriors.com	<i>Seren Trumell</i>
Sonya Mares	346-30th Ave.	94121			<i>Sonya Mares</i>
Anne B. Ruud	3300 Clay St., #4	94118			<i>Anne B. Ruud</i>
Nancy Grahman	3701 Sacramento #359	94118		ngrahman@gmail.com	<i>Nancy Grahman</i>
J. C. Gilmorie	132 Presidio ave.	94115			<i>J. C. Gilmorie</i>
ALVIN SILVERMAN	185 MARINA BLVD	94123			<i>Alvin Silverman</i>
LYVERNE C. CUSO	185 MARINA BLVD	94123			<i>Lyverne C. Cuso</i>

*REQUIRED

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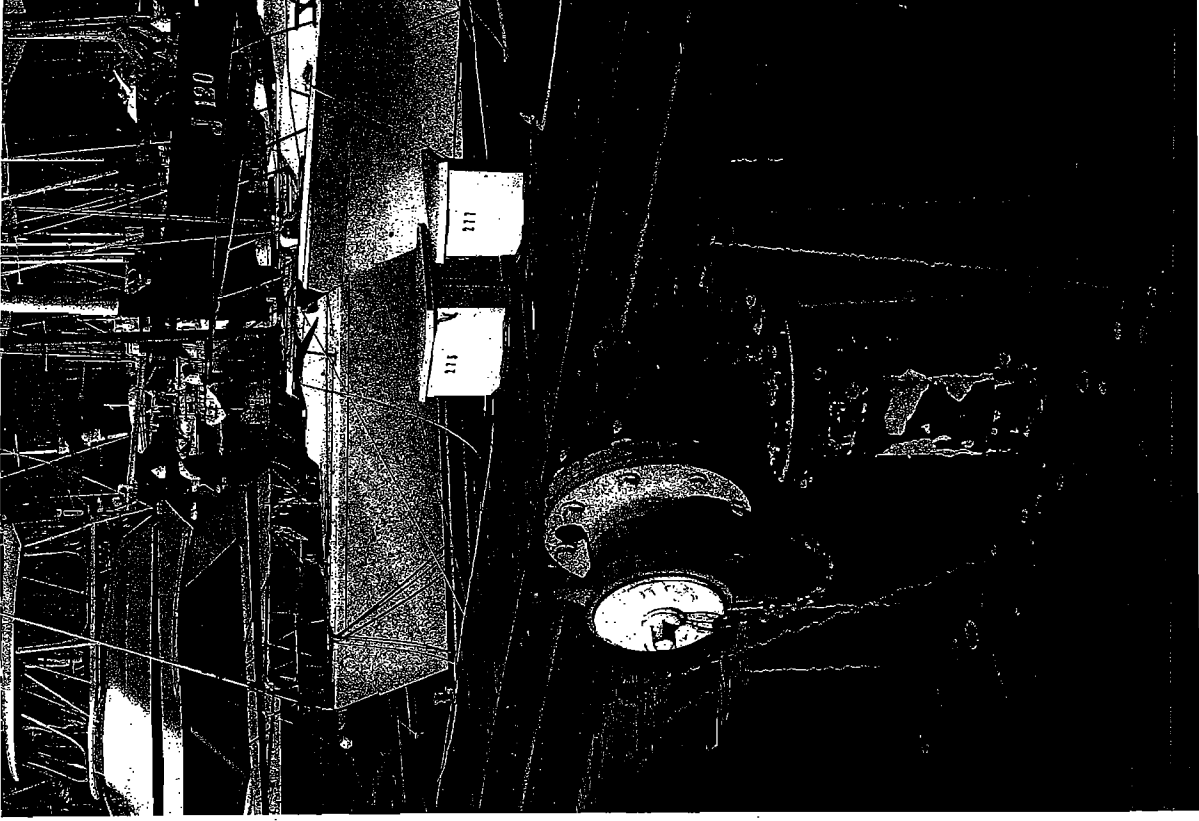
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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use) -	SIGNATURE *
D. Keith LeClaire	745 Marina Blvd	94123	415 447- 2727	kcleaire@caeonline.com	<i>D. Keith LeClaire</i>

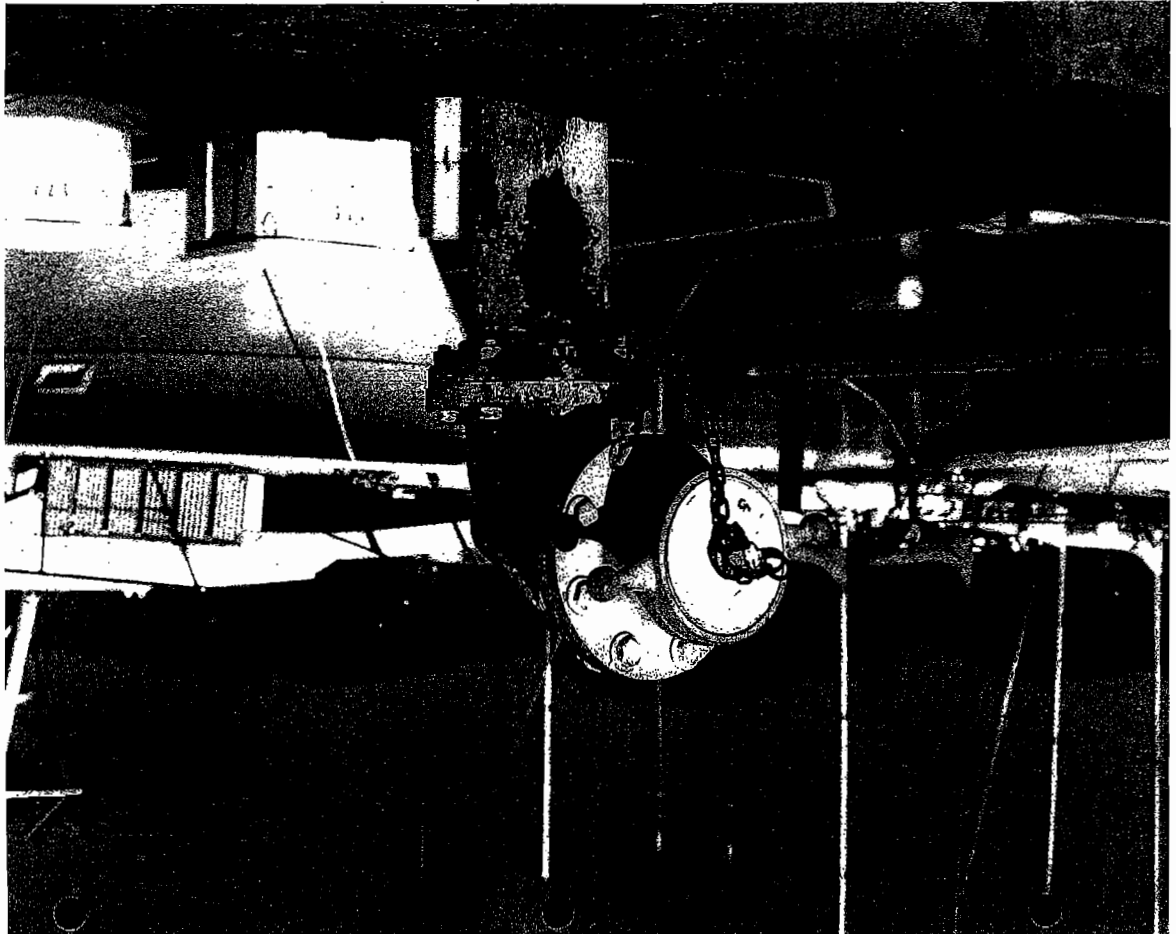
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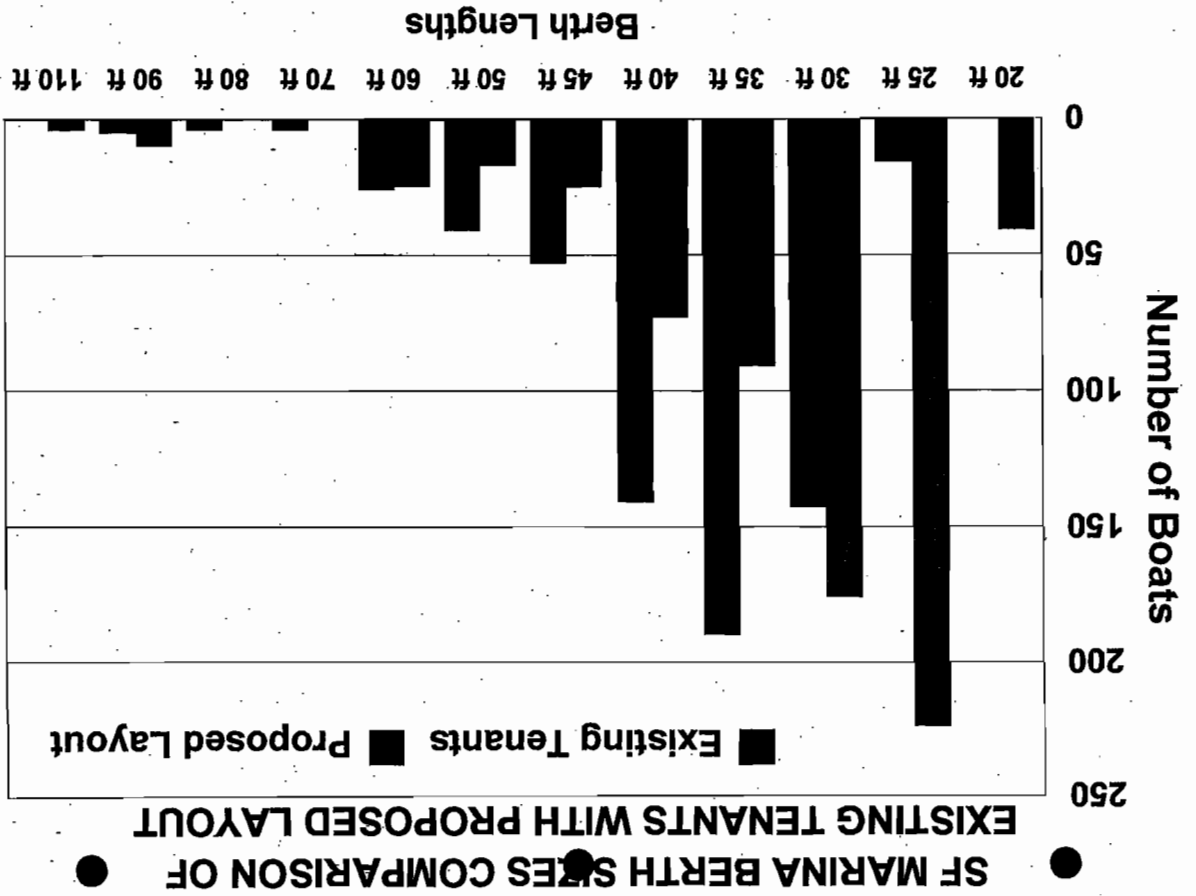
Attachment C



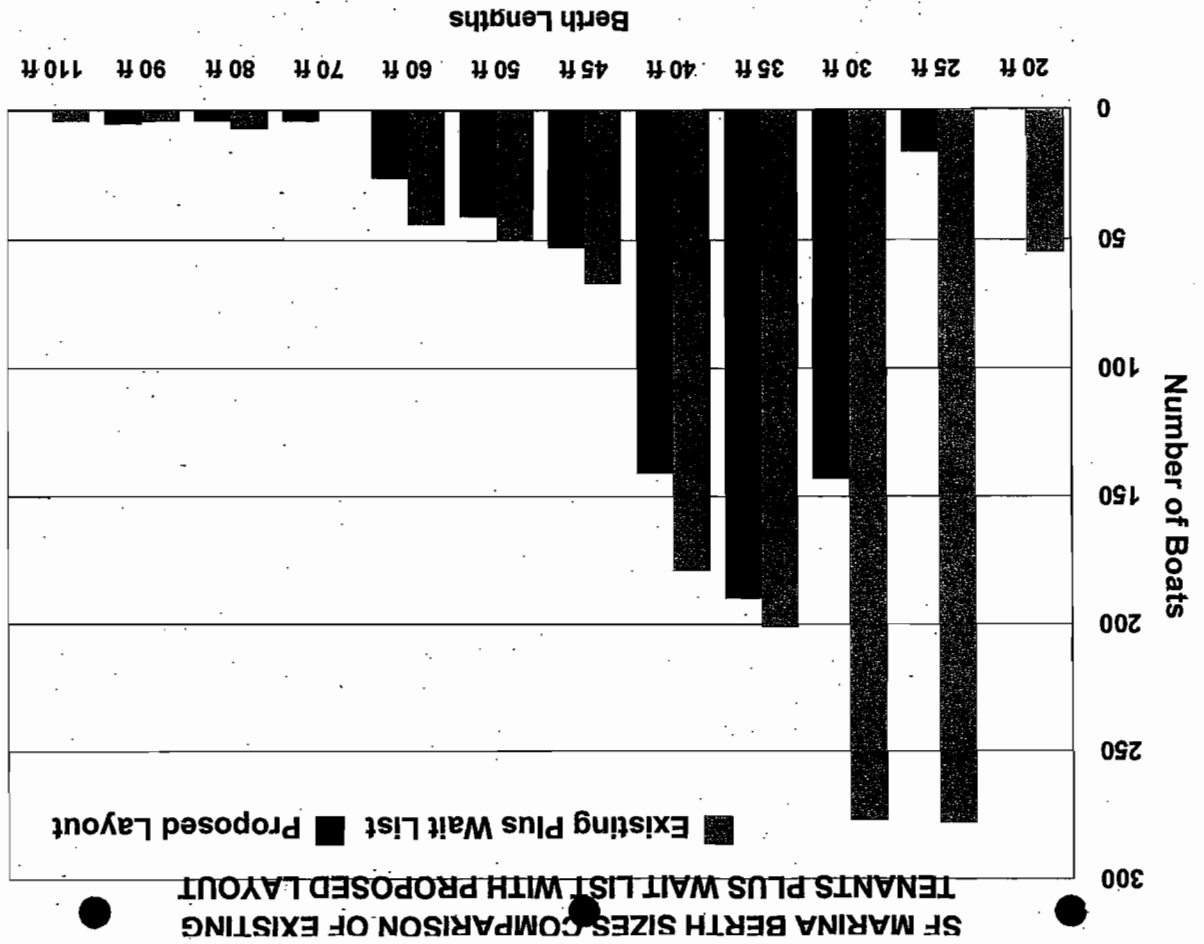
Attachment D



Attachment E



Attachment F





RECEIVED
JAN 19 2006
BY:

Creating, Enhancing and Protecting
the Unique Beauty and Livability of San Francisco

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission St., Suite 500
San Francisco, CA 94103

January 18, 2006

Re: San Francisco Marina Renovation Project, Planning Dept. Case # 2002.1129E, Draft EIR

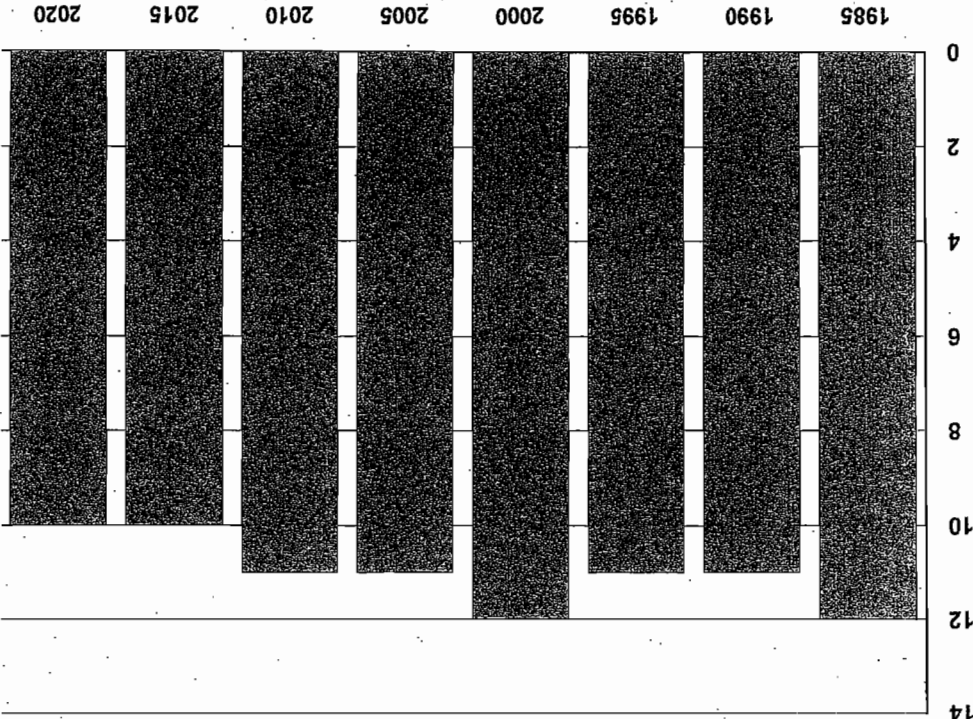
Dear Mr. Maltzer,

San Francisco Beautiful (SFB) is a civic improvement organization founded in 1947, whose mission is to create, enhance and protect the unique beauty and livability of San Francisco. Over the years SFB has advocated for and participated in numerous projects that have benefited our city's world-famous waterfront.

In keeping with SFB's longtime support for San Francisco's portion of the Bay Trail, SFB currently serves on the Mayor's Blue Greenway Committee to extend the Bay Trail along the City's southeast bayshore and on the Blue Greenway Steering Committee of the Neighborhood Parks Council.

In 1992, a \$4,500 SFB grant to Friends of Islais Creek funded a design model which included a spur of the Bay Trail, and in 1999 we provided \$5,035 for Islais Creek improvements. In the mid-1990s, SFB led a multi-year effort to extend the Bay Trail from the Third Street Bridge to the northern entrance to Hunters Point Shipyard, first helping the Department of Public Works obtain a planning grant. We then identified the current route and worked with DPW and the Planning Department to define it in the City's General Plan. We helped the San Francisco Redevelopment Agency obtain a \$100,000 grant for planning the Bay Trail through Hunters Point Shipyard. In 1995 we advocated to support the Bay Conservation and Development Commission. In 1997 India Basin Shoreline Park received an SFB Beautification Award. In 1998, we made a \$5,000 grant for a Marina Waterfront Project Concept Plan, and gave an SFB Beautification Award for Islais Creek Landing. In 2000, an SFB Beautification Award went to Heron's Head Park, followed in 2005 by a \$5,000 grant to Literacy for Environmental Justice for Environmental Classroom landscaping there. In 2001 we gave an SFB Beautification Award to the designers, builders and managers of Crissy Field, which included a major portion of the Bay Trail. Improving access to the bay and the quality of our unique and precious waterfront continues to be an SFB priority.

The portion of the Bay Trail which runs along the San Francisco Marina is one of the most heavily used portions of the 250 miles of San Francisco Bay Trail, which have been completed through nine counties. Thousands of people walk, run, parade, march, bicycle, rollerblade and even dance along the San Francisco Marina every week. (See Attachment 7) Thus, SFB is highly interested in any impacts the proposed Marina Renovation Project (the Project) will have on the neighboring trail.



SAN FRANCISCO BAY
PERCENT OF BOATS OVER 26'
FORECAST BY STATE DBW IN 2002

- Mrs. Heidi Kullmann
Treasurer
- Dave Dow
Executive Director
- BOARD OF DIRECTORS
- Gilbert H. Caselli, III
President
- Mortlyn Dufay
Vice President
- Edward K. Han
President
- Julia Vero
Secretary
- Michael Marzok
Member
- Robin Chong
Member
- Carren C. Clark
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- Michael Dowling
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- Scott Eschlag
Member
- Mark Fenley
Member
- Paul Finkbe
Member
- Robert C. Filice
Member
- Mike F. Hooke
Member
- David Hayes
Member
- Tom Keckis
Member
- Ann K. Lonsorell M.D.
Member
- Susan Tom Lutz, Ph.D.
Member
- Bruce Marzok DDS
Member
- Linda S. Miller
Member
- Tim Poir
Member
- Mark P. Poyet
Member
- Rosemary Spont
Member
- Catherine Smeper
Member

Deficiencies In the Draft EIR

The Project Ignores the Bay Trail

The Draft EIR is deficient and inadequate in its failure to identify the Bay Trail, to describe impacts of the Project on the Bay Trail, to provide alternatives to the proposed actions which would avoid or reduce impacts, and to provide mitigations to the impacts.

The Bay Trail is not even mentioned in the Site Location section of the Project Description.¹ In fact, the only mention of the Bay Trail in the entire document is in the address of a staffer for the San Francisco Bay Trail project, in Oakland.²

How could such an omission happen in a municipal project designed to serve the public? The Project is to be funded by a loan from the California Department of Boating and Waterways, to be repaid by berthing fees from marina tenants. It is understandable that the Project provide for those who will pay for it. It is not understandable or acceptable that others who are affected by the Project would then be ignored. That is simply a bad way to make public policy.

By drawing project boundaries only around the East and West Harbors, with a tiny boundary box around the Former Degaussing Station in between, the Draft EIR is deficient because it fragments a linear recreation route that runs through all of the Project.

The Bay Trail is deficient and inadequate in its failure to describe types of users of the Bay Trail, in particular their wide range of recreational skills, and their range of familiarity with where they are trying to go. For example, bicyclists range from professionals and amateurs with exceptional skills who have ridden for decades and who ride this route as often as daily, to tourists on rented bikes who haven't ridden since they were children and who are riding while gazing sideways at bay vistas while trying to figure out the route to the Golden Gate Bridge. (Attachment 2.) The Draft EIR fails to disclose that elements of the Project will particularly impact Bay Trail users with low skills and familiarity with the area.

West Harbor

From Scott St. to Lyon St., the Bay Trail runs alongside the Marina Blvd. Seawall of West Harbor within the project boundary.³ Two-thirds of the width of the Bay Trail between the Seawall and Marina Blvd. is taken up by a relative handful of parking places for boat owners, an adjacent driving lane and curbs. (Attachment 3.) Because the remaining trail width is inadequate for the heavy recreational use, thousands of recreational users have to maneuver around parked cars and dodge the dangerous row of curbs running down the middle of the Bay Trail, parallel to its flow. (Attachment 4)

Barriers potentially affecting public use. The Draft EIR proposes to further degrade these dangerous and inadequate conditions by installing "suitable barriers on boater-only spaces to control access during the restricted parking period...."⁴ The proposal would give further benefits

¹ Draft EIS, page II-1.
² Ibid., page VII-3. Computer search of .PDF document for "bay trail" returned one hit.
³ Ibid., Figure 1, Project Location, page II-2.
⁴ Ibid., Table 2: Proposed Landside Improvements, page II-10.

to the handful of boat owners who are allowed to park their cars next to their yachts for however long they like, to the detriment of all the recreational users of the Bay Trail. There is no discussion in the Draft EIR of the design of the barriers, but any physical barrier designed to keep unauthorized vehicles from parking on the Bay Trail will be a barrier and hazard to recreational users, as are a number of existing bollards and posts. (Attachments 5, 6, 7) About a year ago, steel arms were welded to the sides of a row of steel bollards across the trail, reducing passage to a series of two-foot widths. (Attachment 8) The arms were only removed after San Francisco Beautiful warned the Harbormaster that they were exposing the City to a high degree of liability.

Streets and driveways where vehicles cross the trail are similarly dangerous, due to poor placement of stop signs, inadequate warning signs and inadequate striping of crosswalks. Conflicts, accidents and near accidents are common. (Attachment 9)

Aside from the bizarre practice of allowing cars to park on a heavily used regional recreational trail, we are told by boaters that allowing cars to park next to boats at marinas is highly unusual, and possibly unique in the Bay Area. While yacht owners need to load and unload gear, other marinas don't allow unrestricted parking next to boats. Instead, equipment is moved on carts or electric vehicles (which we have been told the Marina has). In addition, we have been told by boat owners that the Harbormaster does not permit heavy maintenance, such as engine repair, at dockside. One would also not expect to see a yacht's engine being transported in luxury sedans parked on the Bay Trail, such as the Rolls Royce observed in November. (Attachment 10)

Without cars, the width of the Bay Trail along the Marina Seawall is adequate for trail users. The existing condition, with cars, makes it inadequate and dangerous. Additional barriers would further constrain public use, in effect further privatizing a public facility.

Public Access Dock and Public Hand Boat Launch and Guest Dock. These facilities, shown respectively as Items 13 and 7 on the Proposed Site Plan,⁵ about a portion of the shoreline Bay Trail which has been excluded from the Project boundary. What impacts on the Bay Trail that these additions would have cannot be determined from the inadequate description of the Draft EIR. For example, would trailering, launching or loading activities cross the Bay Trail?

East Harbor

The Bay Trail enters the Project area from the path descending the hill from Upper Fort Mason and turns north across the parking lot in front of the entrance to Fort Mason Center. It follows the south side of Gashouse Cove past the non-functional boat hoist, then follows the eastern and northern edges of the parking lot to the parking area alongside the Fair's Seawall. At Scott St., it follows the driveway to the east end of the Marina Blvd. Seawall, where it turns west. From there, the trail is described under West Harbor.

Although this is the official alignment of the Bay Trail, there are no identifying signs or markings showing its location in this area. It runs through parking lots and, along the Fair's Seawall, runs between two rows of cars parked at 90 degrees. Most cyclists, recognizing that dangerous condition, use the safer pedestrian path along Marina Blvd.

⁵ Ibid., page II-7.

9.3

Boat Hoist. At the south end of the East Harbor, the Bay Trail runs through a 13,600 square foot area which the Draft EIR claims is a former boat trailer storage area, and crosses directly in front of the currently non-functioning boat hoist. The Draft EIR proposes to make the boat hoist functional,⁶ which means that boats, cars and trucks will be crossing the Bay Trail. The Draft EIR says the storage area "has the capacity to hold about 24 trailered boats at one time. Once the boat hoist has been renovated, it is expected that trailered boat storage would return on a daily basis, and that some owners of the small craft currently berthed at the marina would convert to put-in/take-out use."⁷ The Draft EIR fails to identify the impacts of reactivation and use of this facility on the Bay Trail which, on their face, will constitute a major hazard to Bay Trail users, as well as apparent displacement or appropriation of the Bay Trail alignment. The Draft EIR fails to offer alternatives which would reduce or eliminate these impacts. The Draft EIR fails to identify mitigations to the impacts.

9.2

Parking Lots. As noted, the Bay Trail currently runs through East Harbor parking lots. Under "Landside Improvements," the Draft EIR describes "access modifications to the parking lots." There is no description of what those modifications might be. They are apparently different from installation of parking barriers, which are mentioned further along and in Table 2⁸ under East Harbor, Parking element, to "install suitable barriers on boater-only spaces to control access...." The Draft EIR is deficient in not disclosing the potential impacts of these inadequately described access modifications or barriers on the Bay Trail.

Opportunities for Mitigation of Impacts

San Francisco Beautiful agrees with the San Francisco General Plan and policies of the Bay Conservation and Development Commission that provide for maritime facilities along the Bay shore. We have no opinion on the appropriateness of the maritime-specific facilities proposed in the Project. Our issues are with the impacts of those facilities on the Bay Trail, and with the appropriateness and impacts of ancillary facilities such as parking and landside facility location on the Bay Trail.

West Harbor

To remove the impacts of barriers for reserved parking spaces, the barriers should be dropped from the EIR. The numerous, unnecessary hazards along the Bay Trail should be removed. These include steel and wooden bollards and posts, curbs which run with and across the trail, and major bulges in the pavement.

A highly successful model of how to treat the Bay Trail is the portion along Crissy Field, just across the City's jurisdiction line. Along Mason St., the trail pavement is striped into three lanes, two for bikes moving in opposing directions, and a wide lane for pedestrians. Where driveways cross the Bay Trail, bright orange plastic bollards warn drivers not to turn onto the trail. Unlike steel or wood, the flexible plastic bollards do not cause major injury if struck by a runner or cyclist. Unlike on the City side, Crissy driveways have well-placed stop signs and clear, bold and uniform street markings to get cars to stop before crossing the trail. (Attachment 11)

None of these changes are expensive. Most involve only paint and proper maintenance. Hand boat launch and guest dock facilities and their potential impacts are so inadequately described that it is impossible to suggest mitigations. A solution may require inclusion of this area in the process we suggest below for the East Harbor.

East Harbor

This area is more difficult than the West Harbor. Improvements to dangerous and hazardous conditions have been sought for years by various parties. They have always floundered, in major part due to lack of coordination among the jurisdictions, agencies and constituents. For example, agencies include the National Park Service, Fort Mason Foundation, Recreation and Park Department, Department of Public Works, Department of Parking and Traffic, Bay Conservation and Development Commission, Bay Trail Project of the Association of Bay Area Governments, and perhaps others.

SFB is convinced that reasonable solutions can be found if all parties work together. The Project offers an opportunity to achieve consensus. We suggest that mitigation of project impacts include a process that would convene all affected stakeholders to determine how to make the Bay Trail safe and accessible in this area. The work product would be a funded plan which would have to be implemented before construction of the Project could begin. The plan would include, without limitation, adequate signage, striping and consideration of alignments in addition to the shoreline alignment, in order to optimize Bay Trail use.

Since Fort Mason Center is beginning a long term planning process for its facilities, the mitigation plan described above, if affected parties agree, might provide a temporary solution.

Thank you for considering our comments. If you have any questions, please contact Michael Alexander at (415) 441-8700.

Sincerely,

Dee Dee Workman
Dee Dee Workman
Executive Director

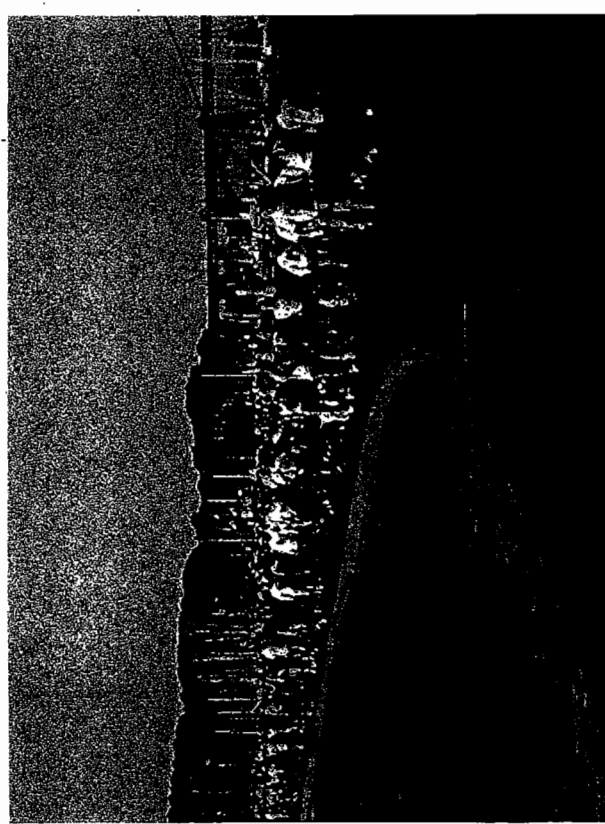
Michael Alexander
Michael Alexander
San Francisco Beautiful Board Member

⁶ Ibid., Figure 3, Proposed Site Plan, page II-7.
⁷ Ibid., page II-41.
⁸ Ibid., page II-11.
⁹ Ibid., Table 2, Proposed Landside Improvements, page II-10.

ATTACHMENT 2



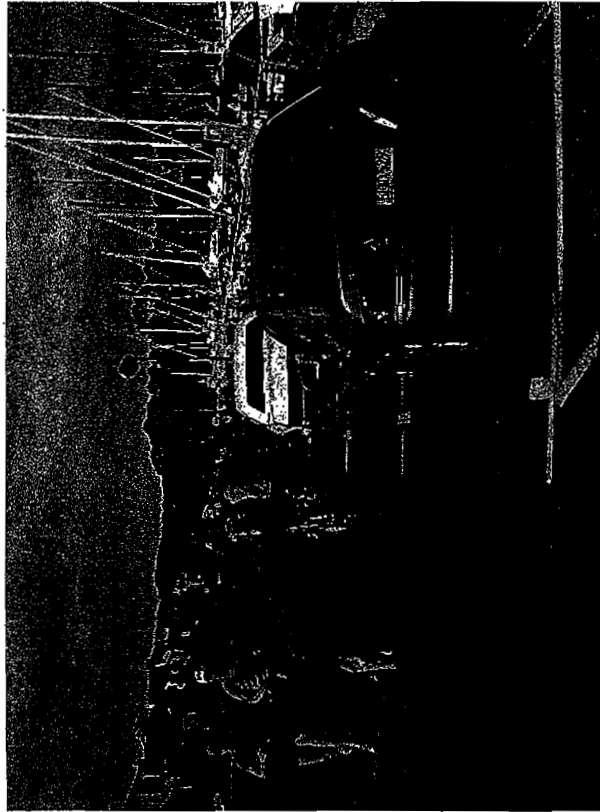
ATTACHMENT 1



ATTACHMENT 4



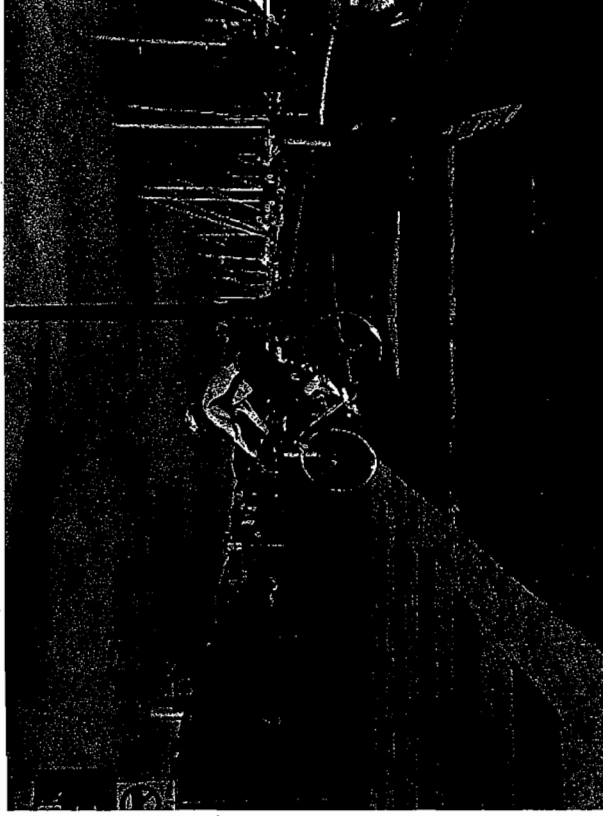
ATTACHMENT 3



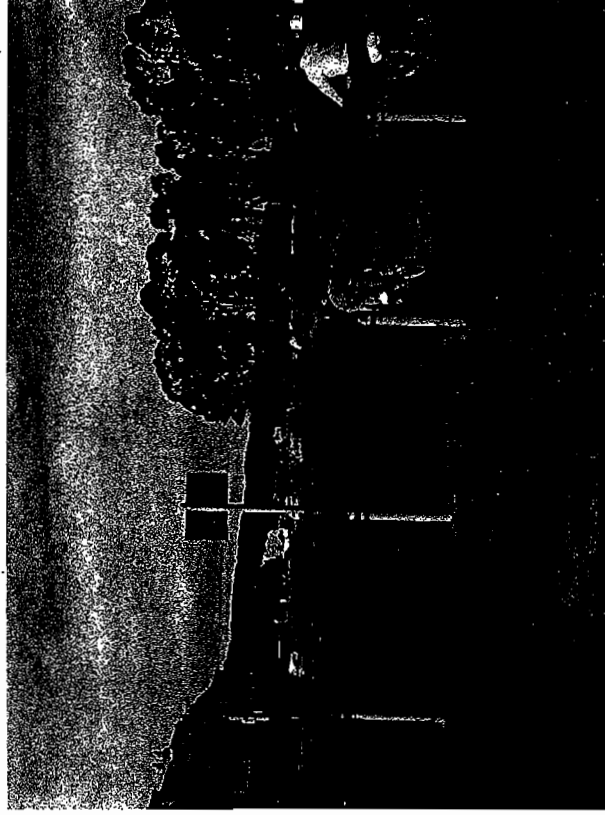
ATTACHMENT 5



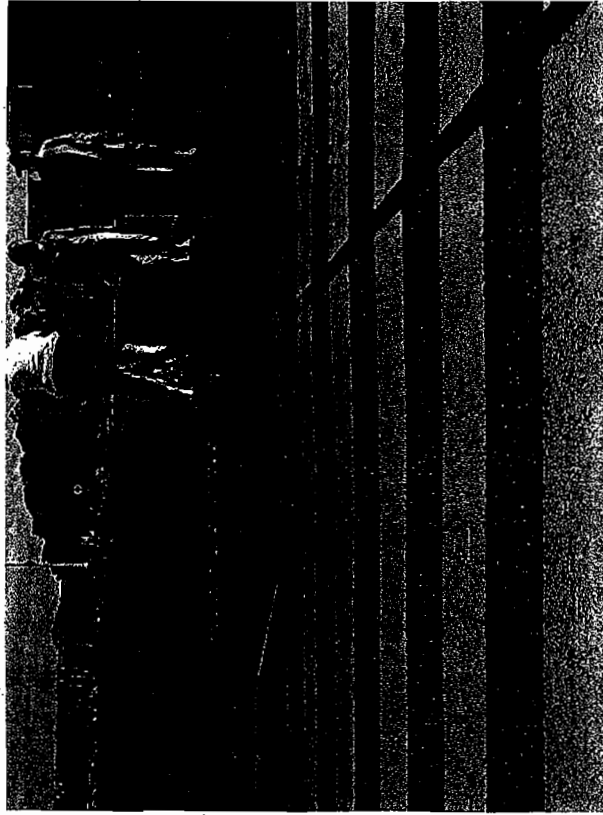
ATTACHMENT 6



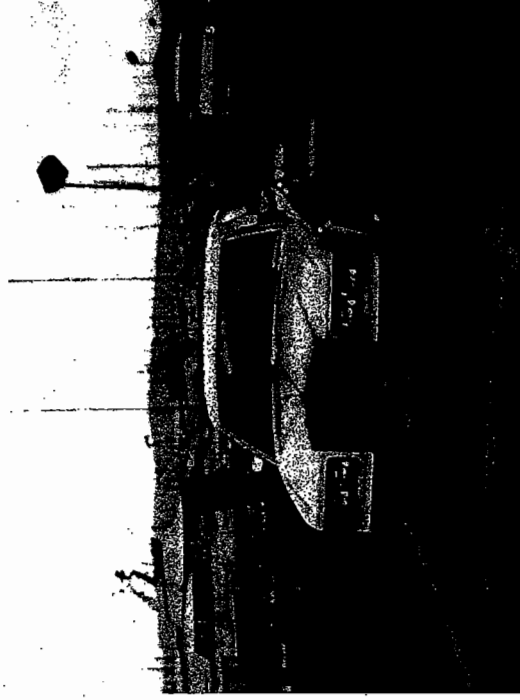
ATTACHMENT 8



ATTACHMENT 7



ATTACHMENT 10



ATTACHMENT 9



ATTACHMENT 11



RECEIVED
JAN 24 2006

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94133

IN REPLY REFER TO:

L76 (GOGA-PLAN)

JAN 19 2006

Mr. Paul Maltzer
Planning Department
City and County of San Francisco
1660 Mission Street, Suite 500
San Francisco, CA 94103

RE: San Francisco Marina Renovation Project Draft Environmental Impact Report (DEIR)

Dear Mr. Maltzer:

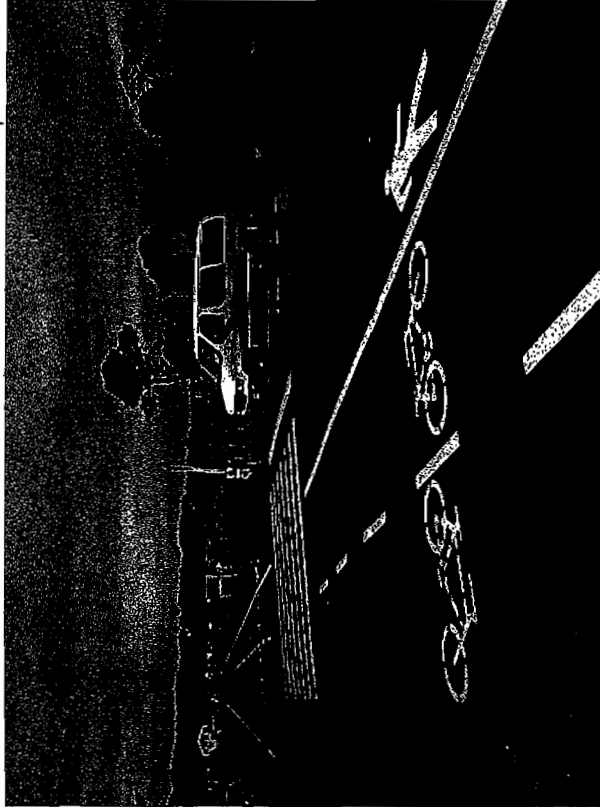
This letter provides comments on the environmental analysis for the San Francisco Marina Yacht Harbor Renovation as contained in the Draft Environmental Impact Report issued on September 6, 2005. The Golden Gate National Recreation Area (GGNRA) supports the needed renovations of the San Francisco Marina and appreciates the City's coordination, especially regarding visual impacts to the San Francisco Port of Embarcation National Historic Landmark. However, we continue to have serious concerns about impacts to Pier 1 at Fort Mason. We disagree with the conclusion that damage to Fort Mason structures would be less than significant.

Fort Mason, including Pier 1 and its associated structures, are part of the San Francisco Port of Embarcation National Historic Landmark District. Pier 1 is deteriorating and seismically unstable and public use of the pier is limited until repairs are made. The NPS has identified the need for a retrofit, but while awaiting federal appropriations for repairs, Pier 1 is vulnerable to damage that could result from the San Francisco Marina Renovation Project. We request that the Planning Commission not certify the DEIR as presented, and that the East Harbor Floating Breakwater component of the project be designed and constructed simultaneously with structural improvements of the historic Pier 1. This is the only way to ensure the project will have no significant impacts to NPS resources. Detailed comments follow below.

Impacts to Pier 1 and Breakwater Improvements Study

The Breakwater Improvement Study completed by Moffatt and Nichol Engineering is a feasibility level of analysis. It states "*numerical modeling analyses were conducted based on standard assumptions, familiarity with site specific issues, and professional judgment. Specifically, field data related to waves, currents, and bottom bathymetry were not collected for performing calibration of the numerical models.*" The modeling predicted changes in wave, current and sedimentation patterns inside the West and East Harbors, not under Pier 1. As such, the study was not able to adequately predict changes under Pier 1. Without a more detailed level of analysis that uses site specific data, the study fails in its intent to accurately address impacts of the breakwaters on Pier 1. As a result, the EIR fails to disclose the extent of possible significant effects of the proposed project.

6.10



It is our opinion that the feasibility study used incorrect assumptions and therefore its conclusions do not accurately reflect a site specific impact assessment. As a result there is no basis to conclude that Pier 1 can absorb the increased wave energy loads directed towards it. For example, the study based its analysis on drawings of the "new" caissons of the 1930's additions to Piers 2 and 3, which could be significantly different from the original 1910 design of Pier 1, 2, and 3. It is important to assess the project's impacts, including lateral loading, on the 1910 pier caissons as they were constructed. Unfortunately we do not have this information and therefore more site specific testing should be conducted on the existing condition of Pier 1. Secondly, there has been considerable necking (reduction in the structural cross-section of the caisson by the wearing away of the concrete) at the waterline on the east side of Pier 1, including exposing the structural reinforcing steel to deterioration. Increasing any wave action could accelerate the necking of this historic landmark. We do not support any action that would increase wave action on the caissons until we are able to raise funding to implement a planned retrofit program to strengthen and repair the caissons.

6.10
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The study also does not adequately address the issue of sediment scouring and deposition and we continue to believe there could be additional scour at the outer end of the floating breakwater. The two dimensional model used (Mike 21) does not adequately deal with horizontal floating obstructions such as a floating breakwater and there is no means to appropriately represent the vertical flows that would result from the presence of this structure. A three dimensional model (Mike 3), would have been a better tool for this study. The pier caissons rest on a concrete pile cap that sits on seven wood pilings. A 1947 inspection with destructive testing of the caissons for all three piers showed that as long as the wood piles were protected by the mud and not exposed to water born organisms, the piles would perform as intended. But, if piles were exposed to water through flaws in the concrete encasement or scouring, they would become readily damaged by marine borers or similar action. From evaluations of the caissons on Pier 2, we know that pile caps on caissons located further from shore are covered in less bay mud. Since Pier 1 sits in deeper water, its pile caps are at more risk of being exposed. Directing additional wave energy under Pier 1 could worsen this situation. It is not acceptable for any scouring, and subsequent damage, to occur as a result of installation of the new breakwater.

6.14

6.14

Mitigations for Soils, Geology, and Seismicity

We do not feel that the proposed mitigations reduce impacts to Pier 1 to an acceptable level.

Mitigation GEO-3

This mitigation postpones identifying and assessing impacts of the breakwater on Pier 1 until a later design stage. An undefined inspection program to determine if the breakwater is causing damage is not adequate mitigation especially since Pier 1 is not identified as being included in the inspection program. This mitigation does not identify what are the options available to the park if we feel that the impacts of the floating breakwater as designed are negatively impacting the resource or what role the NPS would take in the monitoring. Any monitoring program to assess impacts to Pier 1 would need to be closely coordinated with the NPS to ensure agreement on data, methods, and results.

6.10

This mitigation requires periodic visual inspections for evidence of cracks, scour, or other forms of damage, and that identified defects shall be repaired promptly. It is unclear as to

whether the inspections are required to be performed at Pier 1, if inspections and repairs are required to be made for the listed damages at Pier 1 at the expense of the East Harbor operations, or the duration in which such inspections and repairs are to be performed.

Mitigation - GEO 4

This mitigation leaves the definition of an "acceptable structural threshold" open to interpretation. Because Pier 1 is a historic structure, we believe that no damage, structural or otherwise, is acceptable. We know that Pier 1 in its existing condition will suffer damage from adjacent pile-driving: loose concrete will fall into the bay, cracks will enlarge and deterioration will accelerate. We need additional information on the test pile program and the NPS coordination that would occur to determine "acceptable threshold levels" and "alternative pile type or installation methods." This mitigation also does not address the level of repair that will be performed by the project sponsor if any of the pile driving methods damage Pier 1.

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con't

This mitigation does not identify the party responsible for the costs of disassembling and reassembling the breakwater. There is also the possibility that construction of the breakwater as described can have a cost impact on the NPS project for seismic rehabilitation of Pier 1. While this approach does minimize impacts during NPS construction, the piles for the breakwater will impact overall water access to Pier 1. This mitigation also does not discuss increased wave action in the basin, due to removing the breakwater during Pier 1 construction. Since the intent of the breakwater is to reduce wave action in the basin, it appears that temporary removal of the breakwater would increase wave action and potentially cause unintended consequences damage to boats/tenants. The NPS would expect the City to accept all liability for such damage if it occurs. If this removal would not increase wave action, it could then be concluded that the floating breakwater may not be a necessary part of this project.

6.11

To summarize, given the incomplete nature of the study, especially in regards to assessment of potential impacts to Pier 1, we believe that the breakwater could have significant impacts on Pier 1, even with the above mitigations.

Under several impact topics, the DEIR stated that if monitoring revealed significant impacts to Pier 1, then the East Harbor breakwater would be constructed after structural improvements to Pier 1 have been completed. This statement implies that there is flexibility in the construction window of this project component. Given this flexibility and because of the disagreement about and uncertainty of impacts, we request that the breakwater be designed and constructed concurrently with NPS's Pier 1 seismic upgrade project. This would ensure that both the floating breakwater and Pier 1 are compatibly designed so that no damage occurs to either structure. We believe this would also be cost effective for both parties.

6.15

Assessment of visual impacts on Lower Ft. Mason

We commend the City of San Francisco for the manner in which it has begun to address potential new elements to be constructed at the East Marina next to Lower Ft. Mason. As the City proceeds through design and construction drawing development, we request close coordination with the NPS so that park staff may provide review and comment on an ongoing basis.

5.6

Issues of particular concern are as follows: arriving at a breakwater design that is compatible with the San Francisco Port of Embarkation National Historic Landmark district; siting improved trailer boat storage in such a way that it does not crowd the historic wall north of the Lower Ft. Mason entrance gate, nor introduce conspicuous non-historic features that would detract from this historic entry point.

5.6
cont

Offsite Sedimentation and Erosion

There should be a commitment to following the recommendations in the Breakwater Improvements Study that include a "monitoring needs assessment" and "sediment characterization" (App. C, p. 2) to verify and ensure that impacts related to offsite sedimentation and erosion will be less than significant and no erosion or depositional updrift at Crissy Inlet and East Beach would occur. The NPS requests review of these documents.

6.17

Site Access and Circulation

We made several comments throughout the planning process regarding the need to improve circulation around the project area. Parking and automobile, pedestrian, and bicycle circulation through this heavily used area are confusing. Clear, safe, marked routes are needed for pedestrians and cyclists. We understand that these issues are not currently part of the project; however, we request you reconsider addressing these issues. This project provides an excellent opportunity to comprehensively address access in and around the marina. We request these actions be included into the project:

- Safety improvements to the circulation of bicyclists and pedestrians
- Widening the trail and Marina/Laguna intersection in order to create a safe and sensible multi-use connection through the marina parking lot across the entrance to Lower Fort Mason and linking the San Francisco Bay Trail between the marina parking area and the Fort Mason Bay Trail segment. This would assist in moving visitors away from Marina Boulevard to the waterfront pathway.
- Improving the San Francisco Bay Trail alignment through the harbor area, parking areas, and automobile setbacks.
- Officially designate the pedestrian pathway along Marina Blvd as a multi-use trail.
- Coordinate access and circulation improvements in and around the marina with the GGNRA, San Francisco Bay Trail staff, bicycle rental companies, and other hiking and biking organizations.
- Consider widening the landscape strip along the edge of the harbor to create a better buffer between cars and pedestrians.

Hazardous Materials

The analysis for hazardous materials neglects to address some important issues. Clarification is needed to ensure that no NPS resources would be impacted.

DEIR, Page S.II through S-6, Project Characteristics. The DEIR suggests that a geotechnical study is warranted if the Degaussing Station renovation report plan includes ground disturbing activities. In addition, please consider that an environmental report equivalent to a Phase III Environmental Investigation be conducted to determine the severity of existing recognized environmental conditions and the probability and degree of potential impacts to neighboring properties and NPS resources. This Phase III survey is required to address environmental issues- such as lead in soil,

8.11

Polychlorinated Biphenyls, and creosote that have not been fully addressed to date, in either the DEIR or Initial Study (IS). Furthermore, the DEIR and IS do not provide a discussion of Pierce street outfalls and Northshore Consolidated outfalls impact on sediment and need for additional sampling to determine increased potential for this sediment area to impact GGNRA-managed waters upon dredging.

8.11
cont

DEIR, Page S-22. Although the DEIR provides Hazardous Materials/Waste mitigation measures, none of these sections provide for a description of how the mitigation measures will be designed and implemented to monitor and prevent migration of known environmental contaminants onto NPS-managed property.

8.10

The NPS requests the opportunity to review plans for handling and transportation, including spill response, of hazardous materials and wastes, including dredge spoils, for those transportation routes through or adjacent to NPS-managed properties.

DEIR, Page II-14, Approvals. The NPS suggests the project proponents consider the requirement to apply for Notice of Intent on the State of California National Pollutant and Discharge Elimination System - Construction Permit. As such, the NPS would appreciate the opportunity to receive and review the Stormwater Pollution Prevention Plan and accompanying Best Management Practices that could help ameliorate impacts to NPS-managed property, assets and resources associated with the project. The NPS additionally suggest the project sponsor consider and provide a discussion on implementation of Best Management Practices (BMPs) under the City and County of San Francisco Municipal NPDES permit. Neither the discussion regarding water certification on page III.E-12 nor the discussion under Water Impacts on pages 48 and 49 in the IS adequately address these requirements. As such, these discussions do not fully support the conclusion drawn in page 51 of the IS regarding the sufficiency of discussion and mitigation measures associated with stormwater management issues.

7.3

Initial Study, Page 60. Although the *Environmental Cases in the Project Vicinity* section particularly calls out NPS property at Fort Mason, the IS and the following DEIR fail to note that none of the contaminants which are provided mitigation measures or action plans in the DEIR have been documented as releases from Fort Mason.

Initial Study, Page 59. The section on Potential Impacts associated with Soil Excavation fails to address how lead based paint in soil associated with documented sources of lead paint may impact health and safety of workers and recreation users in the vicinity. Further, this section fails to address environmental issues associated with lead in soil. The DEIR neglects to correct this oversight. As such, we suggest collecting soil data for lead and use of the leadsread model to ensure human health and safety and the environment are protected during this project.

11.20

Initial Study, Page 64. The section titled *Creosote* fails to document how the project will ensure creosote-treated logs will be classified to ensure compliance with federal regulations. The DEIR provides no additional clarification. We suggest these federal requirements be addressed in the environmental analysis.

11.21

The section titled *Polychlorinated Biphenyls (PCBs) and Other Building Materials* fails to document how those management practices conducted during the project will prevent worker exposure or release to the environment. The DEIR provides no additional clarification. We suggest adding a

11.22

11.22
cont

section in the DEIR to address these project practices.

General comments on the DEIR

Page III.A.1.1. The cumulative impacts analysis section stated that *As envisioned, the E-Line Extension project would be completed in two phases... Phase 2 [of the E-line Extension Project] would extend the E-Line farther west to the Presidio, either along Marina Boulevard entirely, or along Beach and Cervantes Street and a shorter stretch of Marina Boulevard.* GGNRA will soon initiate an environmental impact statement (EIS) for an extension of the E-Line from Fisherman's Wharf to the Fort Mason Center. This EIS will evaluate the E-Line extension to Fort Mason only. Please note that although the possibility does exist for a future extension to the Presidio, no NEPA analysis has been completed on this extension, and the preferred alternative and route has not been determined.

Cc: Will Travis, Executive Director, San Francisco Bay Conservation and Development Commission

Suzanne Lifson, Director of Client Services, Fort Mason Foundation

Laura Thompson, San Francisco Bay Trail

11.24

5.7

Page III.C-6, para 2. Ft. Mason was used first as a military defense site by colonial Spain 200 years ago, and subsequently by the United States. Please make this distinction clear.

5.7

Fort Mason became part of GGNRA in 1972. Change here and elsewhere in the document.

The National Register status of Fort Mason is as follows: established as a historic district in 1972; district expanded in 1979; San Francisco Port of Embarkation National Historic Landmark established in 1985, including Lower Fort Mason, its three piers, and associated structures.

4, 14

Page III.B-16: In assessing visual and aesthetic resources, impacts from Fort Mason, just not mid-range views of Fort Mason, should also be examined.

1.5

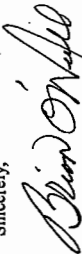
Mitigations. We suggest that you combine all mitigations from the Initial Study and EIR into one mitigation table for easier reference and review.

5.8

Degaussing Station. We recommend that the City of SF continue to publicly interpret the role that the Degaussing Station played in the defense of San Francisco Bay. In this it is thematically related to bay shore historic resources in Ft. Mason and the Presidio that are also publicly interpreted.

Thank you for the opportunity to comment on the proposed project. We look forward to working collaboratively with the City to align the timing and construction of the San Francisco marina east-breakwater and Pier 1 improvement projects. If you have any questions, please contact Karen Cantwell, Environmental Protection Specialist at (415) 561-4842. Please provide us with a copy of the Final EIR when complete.

Sincerely,



Brian O'Neill
General Superintendent

Sue Chang
55 Casa Way, Apartment 201
San Francisco, CA 94123
January 19, 2006

Ms. Lisa Gibson
Environmental Coordinator
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Lisa,

Attached are my comments regarding the San Francisco Marina Renovation Project Draft Environmental Impact Report. While it was impossible for me to be brief with my comments, I tried to organize them in accordance with the report. Because of the repetition in the report, there is some repetition in my response. I hope that it isn't too difficult to follow the intent of the concerns that I have raised.

One of the most difficult tasks was trying to include certain known elements of the project that are not evaluated by this report. If an important fact wasn't included in the information you received, then of course, you didn't include it in your analysis. In those cases, I tried to use the heading "Incomplete" in hopes that you will be able to get the necessary information from the Recreation and Park Department and that you will provide more analysis regarding that particular subject. If you were given inaccurate information or I questioned the validity of a statement, I used the headings "Inaccurate" or "inconsistent." If I felt that a potential impact was not fully reviewed, I used the heading "Inadequate." Please don't be offended by the headings, they are an organizational tool.

As a Marina neighbor, a water enthusiast, and an advocate for our City Parks, this project has been less than a pleasant experience. It is unimaginable to me that this proposal for a \$40M San Francisco Marina Renovation Project is without seismic upgrades to the seawalls. The lack of landside upgrades and improvements consistent with the Objectives of the Planning Code for Recreation and Open Space along our shoreline is a glaring omission. **Irrespective of who ultimately pays for the different elements, the need for a Master Plan for the entire park is evident by the public reaction to this Draft Environmental Impact Report.**

Thank you for helping me through this process, your patience has been appreciated!

Sincerely,
Sue Chang

Sue Chang
Marina Community Association

SAN FRANCISCO MARINA RENOVATION PROJECT

Draft Environmental Impact Report

CHAPTER I THE SUMMARY

A. PROJECT DESCRIPTION

p. S-1

Inaccurate:

In the Project Setting section, the DEIR describes the San Francisco Marina (the marina) as follows: "The marina consists of two harbors: the West Harbor and the East Harbor, also known as Gashouse Cove." This description is repeated on p.II-1 and is inconsistent with that of The SF Marina Renovation Feasibility Study - December, 2002, p.1, which acknowledges the importance of the park setting of the marina and states "The Marina Green, a part of the marina and a major city park, is situated between the East and West Harbors."

Accurate: Because it is clearly stated that it is part of the marina, the effects to the Marina Green should be included in any plan to renovate the City Park known as the San Francisco Marina. The many activities that occur on the Marina Green can not rightfully be excluded from any reviews of environmental impacts in relationship to the renovation project. The importance of the park setting and the open lawns and the vistas to and from the park should not be ignored.

Question: Why was the description of the park (project site) known as the San Francisco Marina allowed to be altered?

p. S-1

Inconsistent:

The DEIR is unclear and inconsistent when describing the waterside and landside features. These descriptions are important. When describing the total land area, p. S-1 the DEIR includes "sidewalks, gangways and parking."

On p. S-2, Project Characteristics section, when describing the waterside renovations, the DEIR includes the "replacement of gangways."

Question: Are the gangways included in the total square footage of the landside or waterside improvements?

Inadequate:

The Marina Renovation Project Plan is inadequate because it excludes the Marina Green, the pedestrian promenade, the parking lots and the biking trail by stating that "The Marina Green . . . is just outside of the project boundaries." (DEIR pS-3) Because of this exclusion, certain elements and objectives of the Planning Code that should be considered in this DEIR are not reviewed.

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PLANNING DEPARTMENT
ADMINISTRATION

The Conceptual Marina Renovation Plan that was approved by the Recreation and Park Commission on August 15, 2002, (p12 of the background information provided to the R/P Commission) states "Pedestrian and bike path improvements would be made." This document was the basis for the R/P Commission's Resolution No. 0208-010 recommending that the Board of Supervisors take appropriate action to support the Recreation and Park Department's application for funding from the State of California, Department of Boating and Waterways.

Question: Why were the improvements to the pedestrian and bike path allowed to be deleted from the project after the Recreation and Park Commission had approved the conceptual project? 2.23

p. S-3

Incomplete:
The DEIR states that "40 percent of the slips in the West Harbor would be realigned from a north-south orientation to an east-west orientation."

Question: For a more accurate description and for more complete analysis, why didn't project sponsor state that 100 percent of the berths in the outer west harbor would be realigned from a north-south orientation to an east-west orientation? 2.24

B. MAIN ENVIRONMENTAL EFFECTS

Land Use, Plans, and Policies

p. S-4

Inadequate:

The DEIR does not adequately address the effects of the removal of the north-south mole at the foot of Scott Street. According to Edgar Lopez and Brad Gross (10/05), the mole measures approx. 133 ft in length and 18 ft wide. The deck at the end of the mole is approx. 18 x 7 ft, per Mr. Lopez and Mr. Gross. The mole is described incorrectly in the DEIR as a "popular destination for sport fishing," and goes on to say that sport fishing would continue to be available in other locations at the marina, including the entire length of the Fair's Seawall, as well as along the new West Harbor breakwaters. Because of its length, width, location (the historical entrance to the West Harbor), and the deck at the end of the mole that overlooks the Harbor and the Golden Gate Yacht Club, it is a popular public access point. This mole is wide, easy to navigate and has a bench that makes it especially attractive to seniors and families with young children. For safety reasons, seniors and families with young children may not feel comfortable walking down a gangway and floating dock to a "public access" point.

Question: The north-south orientation of the mole and the ability to overlook the West Harbor toward the Golden Gate Bridge cannot be replaced and its removal will result in a significant impact to the San Francisco Marina. Please review the impacts on public access and review the historical significance of the Scott Street Mole as it once extended all the way to the St. Francis Spit. 5.9

p. S-5

Inaccurate:

Reference to public access along the West Harbor breakwaters is premature, as there is not yet a design for the breakwaters. Certainly seniors and/or young children could not navigate along a rock breakwater, so it should not be referred to in context to mitigating the loss of the Scott Street mole.

Question: Why is the outlook deck, the accessibility issues and the popularity of this mole ignored in the Draft EIR? How is the loss of this mole as an access point for seniors and families with small children going to be mitigated? 3.4

Question: Why was a statement made regarding access onto the breakwater? Where is it stated in the feasibility study or any of the other documentation that there will be public access to the proposed West Harbor breakwaters? 3.13

p. S-5

Inaccurate:

"The construction of the maintenance building and the expansion of the existing bathrooms in the East Harbor open space area would reduce the usable lawn area by about 0.02 percent of the two-acre open space area."

This reduction in usable lawn estimate does not take into account that any lawn between the bathroom and the maintenance building would be unusable as would any needed driveway or other vehicle access area.

Accurate:

The new construction on the East Harbor Open Space would reduce the useable open space area by 2 percent (not 0.02 percent, as stated).

Question: If the new construction on the East Harbor Open Space would reduce the useable open space by 2 percent (not 0.02%), does that constitute a significant impact on the useable open space? Please analyze actual lawn space that will be out of use, including needed driveways, paths and space between buildings. 3.2

Visual and Aesthetic Resources

p. S-7

Inaccurate: "short range views from the Marina Green looking north could contain potentially larger craft . . ."

Accurate: The existing berths in the outer west harbor are in a North-South orientation. The berth sizes range from 20 ft to 45 ft (SF Marina Renovation Feasibility Study).

In the proposed renovation, 100 percent of the berths in the outer west harbor will be in an East-West orientation. (DPW Department of Engineering/Proposed Layout Plan) The proposed berth sizes will range from **45 to 60 ft**. If even a small percentage of these significantly larger (68% larger on average) boats are power boats, with multiple deck heights, the mid-range views of the open water, the St. Francis Spit and the bay beyond will likely be diminished. It is possible that the long range views of the Golden Gate Bridge, Tiburon and Belvedere will be affected by this change.

Question: Why doesn't the Draft EIR include the diagram of the proposed harbor layout that includes the actual berth sizes? It is important to understand that the Outer West Harbor is going to have berths that are, on average, 20 ft longer than the existing berths in the outer west harbor.

p.S-7

Inadequate

Regarding the proposed maintenance facility and the obstructed views, while it is important to consider the views from Marina Blvd, Ft. Mason and the nearby private residences and businesses, probably one of the most important impacts will be to the pedestrian and bicyclist heading West down the pedestrian path. This section of the Bay Trail is a very popular exercise route, with a par course that connects from Fort Mason.

Question: Why did the Draft EIR disregard the views of the thousands of visitors who come to this park? Also, please evaluate the views of the City and Fort Mason, looking from the West and Northwest shoreline that would be blocked by this new construction.

H. ALTERNATIVES TO THE PROPOSED PROJECT

p.S-27

Inadequate

In addition to analyzing the effects of no project, the Repair and Replace Alternative should be evaluated.

Question: Please evaluate the Repair and Replace Alternative, as suggested by the Marina Civic Improvement Association.

CHAPTER II

PROJECT DESCRIPTION

B. PROJECT CHARACTERISTICS

p.II-8

Table 1 Proposed Waterside Improvements
West Harbor

Inaccurate: the guest dock will be refurbished.

Accurate: The new guest dock, along the new outer west harbor breakwater, is going to be approx 150 ft long (according to Brad Gross and Edgar Lopez 10/05) and will be located where there are currently no docks. This is clearly an expansion to the footprint of the harbor.

Question: Why does the table use the word refurbish, when the proposed plan is clearly not refurbishing the guest dock because the existing guest dock is going to be eliminated and the new guest dock will be twice the length and in a different location?

p.II-9

Table 1. (Continued)

Inadequate: Boat Type: The table states 63% sail and 37% power both before and after the renovation. Allowing the harbor master to estimate these figures is inadequate for this DEIR. For the purpose of visual analysis, particularly in the outer West Harbor, it is necessary to know whether berths that are going to be, on average 20 ft longer than existing conditions, are going to berth power boats or sail boats. The height and beam of a 50 ft power boat varies greatly from that of a sail boat of similar length. In the Outer West Harbor, there are also 60 ft slips that, if filled with gasoline powered yachts, have a great probability of altering views significantly.

Question: Please certify, by independent agency, the current data on the power vs. sail boats - It is important for this information to be sorted by boat length and boat type (power vs sail). Please analyze if the length of the boat gives an indication as to whether the boat is more likely to be a power boat or a sail boat and whether views are likely to be significantly degraded by 55+ foot yachts berthed in an east-west orientation in the outer west harbor.

p. II--9

Table 1

The current slip distribution shows 429 slips that are size 30 feet and smaller. The distribution upon renovation will eliminate 265 berths that are 30 ft and smaller. This redistribution would leave the total number of 30 ft or smaller berths available at 164. The most current wait list, (provided to me by the Harbor Master on 6/30/05), shows that there are 181 applicants on the wait list for berths size 30 feet and smaller.

After renovation, not only will 265 boats potentially be without a berth, but an additional 181 waitlist applicants (some on the waitlist as long as 20 years!) will be forced to look elsewhere for their small boat accommodations. Having a "trailer storage" area for 24 trailers and a renovated hoist will not adequately serve the needs of and will displace many small boats.

Inaccurate: When referring to increases in the size of the boats in the harbor following the renovation, the DEIR uses terms such as "could result in," "on average" and "could attract".

CC U

CC 5

Accurate: Because the project includes an expansion of the harbor into open water that is not currently occupied by berths, and because the total number of berths at the completion of the project is not the same, the "average size" of the berths is meaningless. Larger berths will attract and will result in larger boats.

p. II-10

Table 2 Proposed Landside Improvements

Inaccurate:

Parking: In both the West Harbor and the East Harbor, the numbers of boater-only parking spaces is incorrect. A verified count of general spaces for each area should be completed. (EIR states 301 total boater only spaces, the actual count is 243)

Accurate:

The West Harbor contains 150 boater-only spaces and the East Harbor has 93 boater only spaces, for a total of 243 boater-only spaces. This is significant because recent fee legislation (CCSF Ord. 0162-05) includes a new fee allowing harbor tenants to purchase additional permanent parking permits and allows non-berth holders to purchase temporary parking permits for boater-only spaces. This Draft EIR should fully evaluate the new parking fee legislation.

9.14

Question: Please certify by independent agency, the number of general parking spaces in the Marina Green parking lots.

Inadequate:

The DEIR does not adequately provide information on the Controlled Access gates -- these were not evaluated for visual impacts or for effects on neighborhood parking. Nor were they evaluated for impacts to pedestrians or cyclists along the Bay Trail.

9.2

Question: How will controlled gates be implemented when many of the boater-only parking spaces share an access to the general public parking spaces?

In the East Harbor, the boater only spaces share access to the Fort Mason parking lots. Please evaluate the use of controlled gates on pedestrian usage of the Bay Trail along Marina Blvd.

C. PROJECT SPONSOR'S OBJECTIVES

Proposed Changes to Slip Size and Construction Type

p. II-13

Inaccurate "Approximately 85 percent of the more than 500 boaters on the marina waiting list desire slips greater than 30 feet in length.

Accurate: SF Marina Renovation Feasibility Study p. 9 "85 percent of this waitlist are for slips 30 feet and longer." (not greater than 30 ft) The current demand in the harbor (available slips in each berth size plus wait list applicants in each berth size) is the greatest for the 25 and 30 ft berths. 226 of the berths in the greatest demand will be eliminated under the proposed plan.

2.27

Question: Please see the attached spread sheet that lists the number of waitlist applicants by berth size and correct the statement in the DEIR.

p. II-13

East Harbor Restrooms

It is inappropriate to condone new construction on public open space for private bathrooms and showers for boaters. It is speculative to state that "guest and permanent boaters would be more inclined to use landside showers and toilets and less inclined to use their on-board toilets and showers . . ."

Of the boaters whom I have spoken to, most state that they would continue to shower on their own vessels. With the proposed increases in berth sizes, it is more likely for the vessels to have their own showers, thus decreasing the need for boater showers.

Question: Has a thorough survey of boater needs been conducted? Have the boaters been asked if they would be more likely to use public showers or the showers on their boats?

2.29

p. II-14

Seawall Improvements Not Proposed as Part of the Project

Inaccurate: "The project would be funded by a loan from DBW, which limits the scope of repairs to marina-use improvements."

Accurate: Seismic repairs to the seawall would have been eligible to be considered for DBW funding if they would have been included in the original project loan application. (per Harold Flood, California Department of Boating and Waterways.)

2.1

CHAPTER III ENVIRONMENTAL SETTING AND IMPACTS

A. LAND USE, PLANS AND POLICIES

EXISTING LAND USES

Project Site

p. III.A-1

Inaccurate:

The DEIR describes the San Francisco Marina (the marina) as follows: "The marina consists of two harbors: the East Harbor, also known as Gashouse Cove, and the West Harbor." This definition of the SF Marina is inconsistent with the previous description on p. 1 of The SF Marina Renovation Feasibility Study - December, 2002.

SC 6

SC 7

Accurate:

An accurate description of the Project site must include: "The Marina Green, a part of the marina and a major city park, is situated between the East and West Harbors." Because it is clearly stated that it is part of the marina, the Marina Green and surrounding public use areas should be included in any plan to renovate the City Park known as the San Francisco Marina.

Question: Why did the Draft EIR change the project site to exclude the Marina Green and the public promenade, when they are clearly defined as part of the San Francisco City Park known as the San Francisco Marina? Please evaluate views from the Greens, park users and activities that are permitted on the Greens as part of the Environmental Impact Report.

**PLANS AND POLICIES
SAN FRANCISCO GENERAL PLAN
Open Space and Recreation Element**

p. III.A-3

Policy 2.2 Preserve existing public open space
With the addition of 1600 sq. ft. of new construction to the East Harbor Open Space, the proposed project appears to be in direct conflict with policy 2.2.

Inadequate:

This DEIR has not adequately evaluated the need for the maintenance building. The project sponsor has not been evicted from the PUC building which is currently used for maintenance. The project sponsor has not shown need for this building. Alternative locations been not been considered.

Question: Please require that the project sponsor conduct a thorough needs assessment for maintenance and, if determined to be necessary at this time, require an alternative location for a maintenance building, including off site locations, such as Moscone Playground's maintenance yard, which is located 2 blocks from the proposed site.

SPECIAL CONSIDERATION: PLEASE MAKE NOTE THAT THE PROJECT SPONSOR FREQUENTLY ISSUES PERMITS FOR THE MARINA GREEN AND FOR THE WEST HARBOR "LITTLE MARINA GREEN." THE NUMBER OF PERMITS ISSUED FOR VARIOUS USES HAS INCREASED OVER THE RECENT YEARS. THE EAST HARBOR OPEN SPACE IS THE LAST PIECE OF LAWN AT THIS PARK THAT IS ALWAYS AVAILABLE FOR "PASSIVE" USE BY VISITORS TO THE PARK. THIS LOSS OF OPEN SPACE CANNOT BE MITIGATED.

p. III.A-3

Objective 3: Provide continuous public open space along the shoreline unless public access clearly conflicts with maritime uses or other uses requiring a waterfront location.

Occupation, instead of demolition of the former Degaussing Station appears to be in conflict with this objective. The Degaussing Station was evaluated by the US Navy in 1995 (p. III.C-3) and determined ineligible for listing in the National Registry of Historic Places. The building is located in the center of a major view corridor, looking north from Fillmore Street. The building was built under a special use permit given to the Navy under which it was supposed to be demolished and the land was to be returned to open space which would clearly help the project to meet the objective of "provide continuous public open space along the shoreline." In spite years of public and written testimony asking for the Navy to fulfill its requirement and remove the building, the Project Sponsor chose to accept the building (in spite of the amount of money it will cost to bring it up to code). The Harbor Office has operated successfully from its current location and moving it to the East not only doesn't really help with control of the East Harbor entrance, it decreases the ability to monitor the Inner West Harbor.

Removal of the Scott Street Mole, which provides a wide north-south access into the West Harbor, is also in conflict with the objective of providing public access along the shoreline.

Question: Please evaluate the impacts of locating the Harbor Office, along with harbor vehicles and increased parking and traffic in the center of the Fillmore view corridor and public open space along the shoreline.

Inadequate: The removal of the popular pedestrian access of the Scott Street Mole, which provides a wide north-south access into the West Harbor, a bench and a lookout deck appears to be in direct conflict with the objective to provide continuous public open space along the shoreline unless public access clearly conflicts with maritime uses or other uses requiring a waterfront location.

Question: Please evaluate the loss of use of and views from the north-south orientation Scott Street mole.

p. III.A-4

Incomplete

The DEIR states that "The proposed project would construct a public-access path along 500 feet of existing breakwater as well as undertake additional access and circulation improvements. As such, the proposed project would respond affirmatively to the above Open Space and Recreation Element objectives and policies." According to p. III.B-3, "The East Harbor's north breakwater is constructed of concrete and steel and supports a concrete deck. The irregularly shaped structure is roughly 900 feet long and 6 feet wide . . . Steel pipe railings encircle the pedestrian walkway atop the breakwater."

Inaccurate: While public access to this existing breakwater is a welcome addition to the project, it can not be considered an appropriate mitigation to the removal of the popular pedestrian access of the Scott Street Mole.

3.4

LAND USE CHANGES

p. III.A-8

The DEIR states that the project would make changes to site development but would not "disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any businesses, residences, or other uses."

There is an established, existing use for the affordable, wet storage of small recreational boats at the SF Marina. Per the 6/16/05 public testimony of the harbor master, the harbor typically runs at 97-98% occupancy. There are currently 429 berths, size 30 ft and smaller. The existing wait list includes 181 applicants for berths size 30 ft and smaller. Clearly, there is a demand for small berths at the SF Marina.

Question: How does the Planning Department conclude that the proposed plan, which eliminates 265 berths, size 30 ft and smaller, does not "disrupt or divide the physical arrangements of existing uses and activities on or adjacent to the site, nor displace any businesses, residences, or other uses." There is an established use for small, entry level boats for people of lesser means.

3.15

Inadequate:

1) The DEIR does not adequately study the impacts of the elimination of 265 berths, size 30 ft and smaller.

3.15

2) The DEIR has not evaluated how the project will address the objectives for the updated Improvement Plan, as stated in the San Francisco Marina Renovation Feasibility Study p. 13 "Consider the Change in Marina Berth Market since 1963 and include an updated berth size distribution to enhance revenue generation to help offset the cost of the new facilities, but accommodate the current tenants in good standing in appropriately sized berths."

It appears that these are mutually exclusive objectives. If economics dictates the elimination of 265 berths that are size 30 ft and smaller, it is not possible to "accommodate the current tenants in good standing in appropriately sized berths."

3) The DEIR has not explained how the phasing affects the project. Currently, the DBW has only approved funding for Phase 1, the West Harbor which will be renovated according to the proposed plan. While the overall number of berths in the West Harbor will be decreased by only 1 berth, (from 326 to 325 total berths), 113 berths 30 ft and smaller will be eliminated in favor of berths of 35 ft and larger. (DBW SF Marina West Harbor Loan Summary p.4 San Francisco Marina Existing and Proposed Berth Size Distribution)

2.28

Question: How will the existing occupants of the 113 small berths in the West Harbor be accommodated after completion of Phase 1 of the proposed project?

3.15

Inaccurate:

p. III.A-8

"Although existing boat tenants could be temporarily relocated during construction, they would not be permanently displaced by the project, as they would have the opportunity to return once renovations are complete."

p. III.A-9

"... several boats currently moored at the marina are in berths that are too small, and some marina tenants are expected to move their boats into the larger berths (Gross, 2004)

San Francisco Marina Renovation Feasibility Study p9 "Notwithstanding market area growth of berthable sized boats, we feel that the market for renovated boat slips at the Marina could come primarily from existing tenants, as well as boaters who are on the Marina wait list." "Boat slip distribution was based upon existing tenancy and the Marina wait list."

Accurate: By accommodating 40 fewer boats overall and by eliminating 265 berths size 30 ft and smaller, it will be impossible to accommodate existing tenants when the renovation is complete. Alternative affordable storage solutions are not readily available. After the proposed redistribution of berth sizes, not only will 265 boats be without a berth, but an additional 181 waitlist applicants (some on the waitlist as long as 20 years) will have to look elsewhere for accommodations for their small boats.

Inaccurate: p. III.A-9 refers to Table 1 on p. II-9 (not p. II-8, as the footnote states) The statement that the "most noticeable change in berth size occurs in berths of this size," is misleading because the larger 35 ft and 40 ft berths are actually increasing by 166 berths. The number of 30 ft berths is being decreased by 26 slips. This manipulation of numbers serves to mask the unwarranted elimination of small berths and is common throughout the document.

3.16

Accurate: The "current demand" could be described as the existing number of berths of a particular size, plus the number of waitlist applicants for that particular size berth. The berths sizes in the highest demand at the San Francisco Small Craft Harbor are the 25 ft. berths (total demand - 278) followed by the 30 ft. berths (total demand - 277) followed by the 35 ft berths (total demand - 201).

III.A-9

Renovation of the Degaussing Station for use as the New Harbor Office and Customer Service Center represents a new use of a currently vacant structure on an open shoreline.

11

10

Inadequate

The DEIR did not evaluate the environmental impact associated with increased levels of activity at the currently vacant Degaussing Station. Increases in vehicular traffic and in Harbor Staff Vehicles on the open shoreline are significant negative effects. In addition, on July 12, 2005 legislation was passed by the Board of Supervisors that repealed Section 12.11 of the San Francisco Park Code and adopted a new Section 12.11. The new Section 12.11 includes several new Parking Fees and new Commercial Dock Fees that could significantly increase the use of the new Harbor Office. Recently, the project sponsor has permitted the selling of kites at the site of the Degaussing Station.

9.13

Question: Does the City plan to continue and/or expand the commercial use of the Harbor Office? Please evaluate any further potential use of the Harbor Office site on the basis of environmental impact in addition to the legality within the State Gift of the Shoreline Open Space to the City.

3.1

III.A-9

Inconsistent

The DEIR is unclear and inconsistent when it refers to the amount of lawn in the East Harbor Open Space. p. III.A-9 states that "the proposed maintenance building in the East Harbor area would be constructed on about two acres of land dedicated primarily to open space (except for the East Harbor restroom and parking lots)."

Inaccurate: The construction of the maintenance building and the expansion of the existing bathrooms in the East Harbor open space area would reduce the usable lawn area by about 2 percent (not 0.02 percent) of the two-acre open space area.

Accurate: The reduction in the usable lawn area is at least 2%, depending on whether the stated 2 acres is lawn area only or if the actual lawn is less than 2 acres in size. It should be noted that the area between the two buildings would be lost for recreational purposes as would any lawn area taken for the purposes of a driveway to the maintenance building.

Please note that the existing maintenance building also includes scrap storage and additional dock construction outside of the building.

III.A-9

Inaccurate:

"The project would also expand the 1,970 sq. ft. restroom facilities in the East Harbor by approximately 600 sq. ft. to add tenant showers and restrooms. This action would represent a minor expansion and an enhancement of a current use and would bring the publicly accessible facilities up to ADA compliance."

3.2

Inconsistent:

p. II-13 states "The East Harbor restrooms would be expanded and/or renovated for ADA compliance. They are intended for the use of boaters only, similar to the West Harbor restrooms and showers."

3.17

Accurate:

A 600 sq. ft. addition to the existing 1,970 sq. ft. restroom facilities in the East Harbor represents a 30% increase in the size of the building. While ADA Compliance is extremely important, providing showers and private restrooms for boaters on Public Open Space is not. The need for the bathroom expansion beyond ADA compliance has not been established.

2.29

Inaccurate: The SF Marina Renovation Feasibility Study p. 5 states: "The Marina has an inadequate number of tenant showers and restrooms according to the design guidelines of the State of California's Department of Boating and Waterways."

Accurate:

Tenant showers are not included in the State of California Department of Boating and Waterways Layout and Design Guidelines for Small Craft Berthing Facilities.

Incomplete: Other park uses should be included in the land use analysis. In addition to several special events each year, the Recreation and Park Department permits the Marina Green for youth soccer practice and games in the Fall and Spring. The department also permits the "Little Marina Green" (the West Harbor Open Space) for special events and for volleyball, camps and running clubs almost year-round.

Question: What is the actual size of the lawn-only portion of the East Harbor open space? What percentage of the existing lawn-only portion in the East Harbor would be eliminated by the expansion of the bathroom, the addition of a maintenance building, a driveway to the building and additional use surrounding the maintenance building? Please certify by independent agency.

3.2

NEIGHBORHOOD CHARACTER AND COMPATIBILITY

p. III.A-10

Because it is clearly stated on p.1 of The SF Marina Renovation Feasibility Study - December, 2002, that "the Marina Green is part of the marina and a major city park", the Marina Green should be included in any plan to renovate the Recreation and Park Department land known as the San Francisco Marina. The activities that occur on the Marina Green should not be excluded from any reviews of environmental impacts in relationship to a renovation project of any magnitude.

Inadequate:

The DEIR is inadequate because it fails to recognize the importance of the wide range of recreational activities available at the Major City Park, known in its entirety as the San Francisco Marina. It is negligent to ignore the significance of the Marina Green and the East and West Harbor Open Spaces, and to disregard the open views of the lawns, the bay and beyond.

3.2

CC-13

Inadequate:

The DEIR does not accurately represent the proposed renovation's cumulative effects on the character of the project site. The elimination of park open space for private showers and bathrooms and a maintenance building should not be considered "consistent with the prevailing uses."

The decision to remove popular public access points, such as the Scott Street Mole and adding 350 ft of breakwaters in the outer west harbor in order to accommodate 68 yachts that are on average 20 ft longer than current conditions, needs more thorough evaluation.

3.18

Question: While the harbor and the boats are an important characteristic of the Marina neighborhood, the predominant and defining characteristic of the Marina neighborhood is the Marina Green and the open shoreline. Please evaluate the components of the project as they affect or are affected by the most frequent park users, which are the non-boating public.

3.14

B. VISUAL AND AESTHETIC RESOURCES

Impacts Views

p. III.B-9 Inaccurate:

The simulation of the Maintenance Building and the Degaussing Station are inaccurate because they omit the additional characteristics associated with the uses of the buildings. The Maintenance and Harbor Office frequently have Harbor vehicles parked nearby. Currently, the PUC building has an old, broken gate and 2 large sections of new docks staged outside the building.

Question: Please evaluate the additional impacts of large harbor vehicles and the storage of materials outside of the buildings in the photo simulations of the proposed maintenance building and Harbor Office. Evaluation should also include a photo simulation depicting the removal of the Degaussing Station and return of the site to shoreline open space.

4.2

Please evaluate the effects of the lighting of the building at night on an existing dark shoreline. Though the Harbor Office may not be open to the public, there is currently a night watchman on staff until midnight.

11.2

p. III.B-11 Inaccurate:

While p. III.B-4 states that this is a "worst case scenario", but

- 1) the panoramic nature of the simulation does not depict the actual view from the pedestrian promenade.
- 2) the photo shows sailboats but there may be power boats, several decks high, blocking views of the St. Francis spit, the bay and beyond to Tiburon and Sausalito.

4.6

3) the photo shows a rock breakwater, which is arguably much more attractive than the alternative sheet pile breakwater.

Accurate:

The outer west harbor currently consists of 72 berths in a north-south orientation. 92% of the berths are either 25 or 30 ft long. Views include mostly low profile boats, open water, the St. Francis spit, the bay and beyond.

The proposed outer west harbor will consist of 68 berths, of which 88% are either 45 or 50 ft, with the remaining 12% being 60 ft berths. The open water will be covered with 350 feet of breakwaters, a 150 ft guest dock, significantly larger boats and a significant increase in docks covering the water.

Question: Please include 55+ ft power boats and sheet pile breakwaters in the photo simulation. This would be the "worst case scenario."

4.12

Inadequate:

The DEIR should accurately analyze, not "estimate," the number of sail boats vs. power boats and how the type of power correlates with the size of the boat.

Question: Is the yacht occupying a 60 ft berth in the outermost portion of the Outer West Harbor more likely to be a sail boat, with less visual impact on the site or a power boat with several deck heights which will have a significant negative impact on the mid and long range views?

4.6

Inadequate:

There is no evaluation of views looking back to the City and the Marina Blvd Homes from the St. Francis Spit. There is no evaluation of views looking West and/or South at the new Maintenance Structure from the shoreline toward Ft. Mason and/or Russian Hill

Question: Please evaluate the loss of views from the park visitors' perspective. Evaluate the impact to views from the tip of the St. Francis spit and the Wave Organ looking South to the neighborhood, the Palace of Fine Arts and beyond, include views from adjacent properties, such as the hills of Fort Mason and the view corridor of Fillmore Street. Evaluate each location from 360 degree views because the greatest impacts will be to park users who are at ground level.

4.1

C. HISTORIC RESOURCES

Inadequate:

Although the DEIR chronicles the history of the development of the Marina, it does not mention when the expansion to the Outer West Harbor occurred. This is important because the St. Francis Spit was built to protect the Inner West Basin. The spit was not intended to protect boats East of the Scott Street Mole because the wave action and surge is far too great.

5.9

The need for breakwaters to protect berths in the outer west harbor is directly related to the poor historical decision to develop the outer west harbor.

Question: When was the "Outer West Harbor" developed, i.e. when were berths added to the area east of the Scott Street Mole? When was Scott Street shortened and when was the deck on the end of the mole built? Is there any historical significance to this?

CHAPTER V OTHER CEQA TOPICS

Transportation and Parking

V-3

Inaccurate:
The number of boater-only parking spaces reported in the DEIR is inaccurate.

Question: Please certify by independent agency the correct the number of boater-only and general parking spaces.

V-3

Inadequate:
The new Harbor Fee Schedule created changes in procedure and regulations and should be reviewed and evaluated for environmental impact as it relates to the harbor renovation. Included in the fee schedule are the following new fees which may be associated with a significant impact.

1) Commercial Dock Fees- the commercial dock fees have no restrictions. The existing guest dock at the end of the Scott Street mole serves as the "Commercial Dock." Following the Renovation, the Marina will have a new guest dock near the West Harbor Breakwater and a new guest dock in the East Harbor. The expansion and addition of guest docks, and the new use as a "Commercial Dock" requires review of impacts on the parking in the Harbor parking lots, impacts on traffic with the potential increase in tourist activity, taxi cabs and tour buses, noise levels, etc. **Even if these are non-profit whale watching tours, as Mr. Agunblade testified, there are still parking and traffic impacts associated with the operation of a non-profit business.**

2) "Special Event" parking fees - this allows the harbor to block off existing free public parking spaces in order to collect fees for special events in the area. How will this relate to the proposed controlled access gates, and how will it affect the neighborhood as it reduces the number of free spaces for park users, or as special event attendees attempt to avoid parking fees and look in the neighborhood? **It has already been noted that valet vans are traveling through the parking lots at unsafe speeds between the harbor lots and the various Fort Mason venues. How will controlled gates affect these operations?**

3) Trailer/dingy parking \$7.50/day - Is this in the parking area near the hoist or is there another designated area? Will this impact parking for boaters or other park users?

4) Temporary Parking permit - \$7.50/day - This allows non-harbor tenants to purchase parking permits that will allow parking in previously harbor tenant-only parking. Will this force boaters and/or other park users into the neighborhood in search of free parking?

V-4

Inadequate:
Clarification is needed as to the intention of the trailer parking near the renovated hoist. The DEIR states that there is no trailer parking except for in an area by the hoist in the East Harbor. This appears to be incorrect, as there is trailer parking in the West Harbor lots by the St. Francis.

Question: Where is the designated area by the hoist that is intended for trailer and boat storage? Is it for permanent dry storage of boats on trailers, or for daily use only? What is the square footage of the designated area? How many cars and trailers will fit in the designated area? If the area is currently under lease with City Yachts, what is the likelihood that the area will be available for public use?

Why was a traffic study not conducted as it relates to the possibility of traffic backups associated with the renovation of the hoist?

Electrical Consumption

V-6

Inadequate:

Evaluation of the electrical upgrade is incomplete. While expected usage is important, and the DEIR states that the "project site is currently served by an electrical system with sufficient capacity. . ." A more thorough analysis is required. The renovation plan calls for "a minimum of 30 amps per berth." The need to bring more power to the site would raise the questions of how the power would be brought in and if there would be health concerns associated with that.

Questions: How many amps of electricity will go to each 30 ft berth? each 35 ft berth? 40 ft berth? 45 ft berth? 50 ft berth? 60 ft berth? 70 ft berth? 80 ft berth? 90 ft berth? What is the total amount needed for the harbor renovation? What is the existing amount of amperage available? Please verify that the harbor currently has all the power that is necessary and that no additional power will need to be brought to the site because of this plan.

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con't

9.15

9.14

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SC 16

SC 17

Request for analysis
The following items were not adequately addressed in the Draft Environmental Impact Report

Marina Green

Because the Marina Green was excluded from the project, the review did not discuss current uses of the Marina Green when evaluating the impacts of the project. During Fall and Spring, MicroSoccer is played extensively on the Marina Green. Microsoccer players are the youngest league players, with children ranging in age from under 5, to under 9 years old. While the games are on Saturdays, several teams hold their practices on the Marina Green after school. Claire Lilenthal, a local K-8 public school frequently brings school children to the park for Physical Education.

Question: Please evaluate the construction-related noise as it would affect school children and permitted sports on the Marina Green.

Parking

The Dept. of Boating and Waterways recently published an updated version of their Layout and Design Guidelines for Marina Berthing Facilities. The DBW guidelines and the elements of the Planning code as they relate to parking appear to have similar goals - that "Large visual expanses of paved area should be avoided." (p. 62, Layout and Design Guidelines for Marina Berthing Facilities)

Question: Does the Project Sponsor plan any beautification of the parking area to more closely represent the guidelines of the Planning Code and the DBW as it relates to the vehicle parking along the public shoreline?

Breakwaters and Water Quality

The DEIR does not evaluate the affects of the breakwaters in the outer west harbor in relationship to the storm sewer runoff outlet that appears to the East of the proposed location of the West Harbor Breakwaters.

Question: How will the breakwaters being placed outside the storm sewer runoff pipe affect the water quality of the inner west harbor following storm sewer overflow?

Drafting Hydrants

There was no evaluation of the drafting hydrants that were installed along the seawalls following the Loma Prieta earthquake. How will this project impact the drafting hydrants and there ability to pull water from the bay in the event of a large fire in the Marina District?

Would seismic upgrade to the Marina and Fairs seawalls improve the likelihood that the drafting hydrants would remain in operable condition following a large earthquake?

Would the DEIR's conclusion "to repair the seawall and the sidewalk after an earthquake" affect the ability of SFFD to access the drafting hydrants in the event of a large fire in the Marina District?

Seismic Upgrade to seawalls

Mr. Rollo testified that seismic upgrade to the seawalls might not provide enough protection to help the homes closest to the Marina in the event of a large earthquake.

Seismic upgrade to the seawalls would increase the walls' ability to withstand an earthquake. It would protect anyone who might be along the seawall or pedestrian promenade at the time of an earthquake. It would protect the drafting hydrants, which could not only provide crucial fire protection for private property, but also the Claire Lilenthal Elementary School, located 2 blocks from the project site. It could help prevent injury to the hundreds of people who sit along the seawall during the Fleet Week festivities. To ignore this known risk is unforgivable.

The seawall has been determined to be historical. We should do everything possible to protect its historical significance.

Lack of a Master Plan

While I understand the desire for this plan to address only boater concerns, there should have been a master plan developed for this park. The existing pedestrian promenades and bike lanes have not been reviewed for current usage. This is especially true along the Inner West Harbor and Marina Blvd. If new gates and docks are designed according to existing parking layouts, any changes to the pedestrian promenade and parking layout to provide better access along the waterfront would make the new gate system obsolete. A Master Plan, taking the Bay Trail and pedestrian safety into consideration could affect harbor layout.

St. Francis Spilt

The DEIR claims that the project will have no effect on the St. Francis Spilt. Evidence shows the damage that the spilt endured in the Loma Prieta earthquake has compromised the spilt and that sand may be entering the inner west harbor from underneath the St. Francis Spilt. This possibility has not been addressed in this DEIR and this condition could have significant impacts on the frequency of dredging the harbor and could explain some of the damage to the existing berths. If the DEIR is incorrect in blaming the surge for the majority of the berth damage, then the effect of the sand coming underneath the St. Francis Spilt could affect the efficacy of the proposed breakwaters.

6.6
cont

6.8

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6.18

11.5

2.30

7.1

6.6

SC 18

SC 19

Proposed San Francisco Marina Renovation							
Current Needs, by berth size, as determined by fully occupied existing berths plus current wait list applicants							
Slip (ft)	Current		Existing needs (berths plus wait list)	Proposed		underserved	overserved
	# of slips	wait list		# of slips			
20	39	16		55	0	-55	
25	216	62		278	16	-262	
30	174	103		277	148	-129	
35	90	111		201	190	-11	
40	75	104		179	141	-38	
45	25	42		67	53	-14	
50	17	33		50	41	-9	
60	26	18		44	26	-18	
70	0			0	4		4
80	2	5		7	4	-3	
90	4			4	5		1
100		4		4	0	-4	
	668	498		1166	628	-543	5

Currently, there are 498 boaters on the wait list. 36% are for berths 30 ft or less, 63% are for berths 35 ft or larger.

After renovation with proposed plan, of the underserved, 446 (82%) will be boaters needing a berth 30 ft or less.

PHASE 1 - West Harbor Renovation Only				
Current Slip (ft)	# of slips	total linear ft	change	# of Slips
20	19	380	-19	0
26	66	1625	-57	8
30	71	2130	-37	34
35	24	840	22	48
40	76	3000	33	108
45	24	1080	29	53
50	17	850	22	39
60	28	1560	-2	24
70	0	0	4	4
80	1	80	3	4
90	4	360	1	5
	326	11905	-1	325
		eliminating 113 slips 30 ft and smaller		
				13875

SC
21

SAN FRANCISCO FILM COMMISSION

[Choose a New Search Criteria](#) | [Back to the Thumbnails](#) | [Perform a New Search](#)

Number 3 of 11
[Previous](#) | [Next](#)

Photo ID: ggbridge.bench.marina
Time: 15:28:31
Direction: W
Photographer: Carole Isaacs
Date: 03-Nov-02
Weather: Sun
Type of Shot: Exterior
Lens / Angle: W



Description: "Golden Gate Bridge, view from Marina Green"

This view would be dramatically different with the proposed breakwaters, whether they are rip rap or sheetpile. Much of the open water, bay and beyond views will be filled with new docks, and large yachts.

SC 22

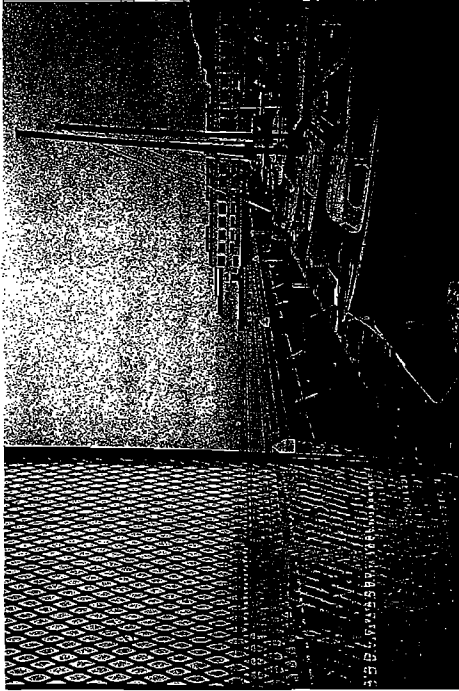
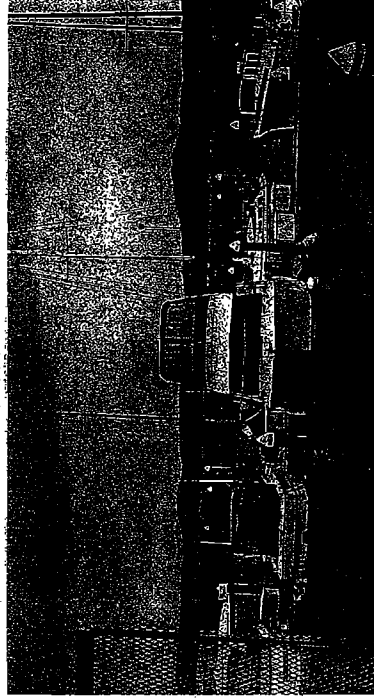


Photo of the East Harbor Sheetpile breakwater that is proposed to have new public access. While the photo-simulation of the West Harbor breakwater is a rip rap material, the project sponsor may elect for the West Harbor Breakwater to be this sheetpile material.



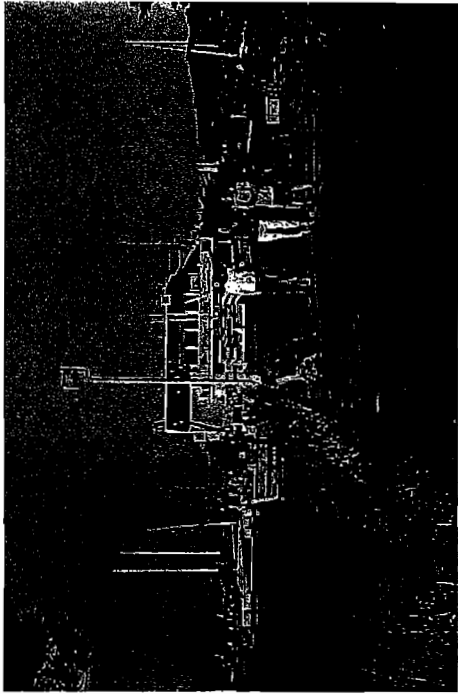
Outer West Harbor - example of how views are affected by larger boats with multiple decks. Please note: if the Outer West Harbor is reconfigured as proposed, there will be no berths less than 45 ft. in length and the yachts will be in an East-West orientation, not North-South as it is today. Views will be of the broad side of the vessel.

SC 22



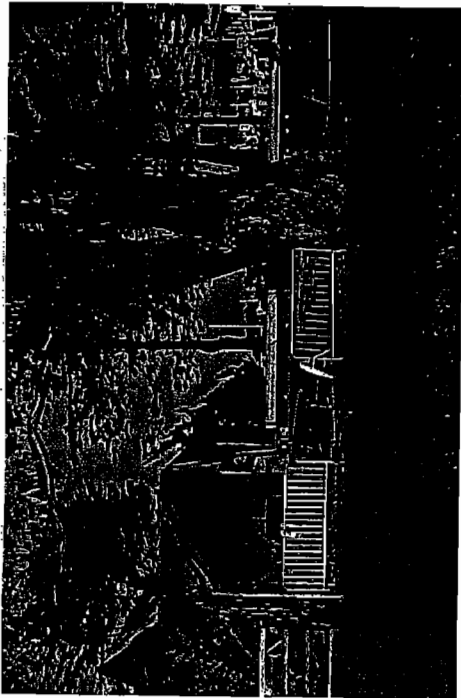
Visitors along the Fair's seawall during a typical Fleet Week Parade of Ships.

SC
25



Scott Street Mole on a typical day. (note: these are not posed, I do not know the folks in the photos)

SC
211



Existing Maintenance building in the Northwest corner of the project site. This unacceptable blight is less visible in its current location than it would be at the proposed new location.

Dear Lisa -
Please add these to the Marina Community Association response to the Draft EIR.
Two more signature pages and several additional petition signatures in support of the repair and replace alternative.

Thanks
Sue Chang

SC
2/2

MARINA COMMUNITY ASSOCIATION
1517 North Point, # 531
San Francisco
CA 94123

Phone: 415-346-4164 e-mail: marina.94123@sbcglobal.net Fax: 415-346-4184

JOINDER IN LETTER OF COMMENTS SUBMITTED BY THE
MARINA COMMUNITY ASSOCIATION CONCERNING THE
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SAN FRANCISCO
MARINA RENOVATION PROJECT (CASE NO. 2002.1129E)

The individual named below wishes to join in the comments submitted to the Planning
Commission by the Marina Community Association in January 2006, and agrees with
those comments.

NAME (print): ROBERT BROCKEB
ADDRESS: 1490 FRANCISCO #7
SAN FRANCISCO, CA 94123
PHONE: 415-447-7992
FAX: _____
E-MAIL: LIVEBACH@aol.com
SIGNATURE: Robert Brockeb
DATE: 1.18.06

MARINA COMMUNITY ASSOCIATION
1517 North Point, # 531
San Francisco
CA 94123

Phone: 415-346-4164 e-mail: marina.94123@sbcglobal.net Fax: 415-346-4184

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MARINA RENOVATION PROJECT (CASE NO. 2002.1129E)

The individual named below wishes to join in the comments submitted to the Planning
Commission by the Marina Community Association in January 2006, and agrees with
those comments.

NAME (print): Diane Donovan
ADDRESS: 1490 Francisco St #7
San Francisco, CA 94123
PHONE: 415-447-7992
FAX: _____
E-MAIL: Sarvani3@yahoo.com
SIGNATURE: Diane Donovan
DATE: 1-18-06

PETITION TO SAVE THE MARINA

We, the undersigned residents of San Francisco, urge the City and County of San Francisco Recreation and Park Commission, the Planning Commission and the Board of Supervisors to preserve the character of the City Park known as the "San Francisco Marina". The "San Francisco Marina" is defined to include the Small Craft Harbor and the landside elements North of Marina Blvd, bound to the West by the Presidio and to the East by Fort Mason.

We are in support of **The Repair and Replace Alternative**, which would require the following: **Repair and make replacements as needed to the existing harbor facilities with the existing layout and the existing berth size distribution. Do the necessary dredging and sand mining. No new building construction or building additions. No additional West harbor breakwaters. Demolition of Degaussing Station and return of the site to Open Space. Seismically retrofit the Marina Boulevard and the Fair's Seawalls.**

By signing this petition, we are stating that we are **AGAINST commercial charter boat and cruise activity** in the San Francisco Marina and request that any commercial dock fee legislation for such activity be repealed and commercial activity by individual harbor tenants or other entities be halted immediately.

NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
HENRY SAFRIT	4516 VALLEJO ST	94123	922-1630		<i>Henry Safrit</i>
Karin Safrit	2526 Vallejo	94123	922-7600		<i>Karin Safrit</i>
Henry Safrit					
GERALD H. NAWMAN	1050 CHESTNUT ST	94109	922-1879		<i>Gerald H. Nawman</i>
C.HERYL D. DU COTE	2349 VALLEJO ST	94123	595-0527		<i>C. Heryl D. Du Cote</i>
MICHAEL I SPIEGEL	181 MARINA BLVD	94123	922-5716		<i>Michael I Spiegel</i>

*REQUIRED

THANK YOU FOR HELPING TO PRESERVE THE MARINA!

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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE *
JOAN C. KAHR	1040 Lombard St	94109			<i>Joan C. Kahr</i>
Patrick McCabe	26 Broadway St	94117			<i>Patrick McCabe</i>
MARTIN COHN	1524 WILLARD	94117			<i>M. Cohn</i>
JOHN MEYER	38 MONTECALVO SPRING	94114			<i>John Meyer</i>
BERIT MUH	1150 SACRAMENTO ST #102	94108			<i>Berit Muh</i>
CAROLINE AUGUSTA STEWART	2020 HIDE ST #1 SFCA	94109			<i>Caroline Stewart</i>

*REQUIRED

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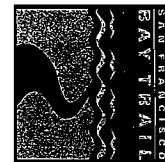
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NAME *	ADDRESS*	ZIP*	PHONE	EMAIL (for neighborhood use)	SIGNATURE*
JEREMY POLACCI	217 16th Avenue	94118	415.666.3358	JPOLACCI@HOTMAIL	<i>[Signature]</i>
Tee Lito	2905 Van Ness Ave #509	94118	845-0851	lwb@cs.cornell.edu	<i>[Signature]</i>
Pete Lynch	2887 24th St.	94116	648.6514	pete@lynch.com	<i>[Signature]</i>
RANDI SHIELDS	1670 Jones St	94109	415.674.6709		<i>[Signature]</i>
Jennifer Bee	1906 Union St	94123	415.292.1117	JGedall@calix	<i>[Signature]</i>
Stacy Egan	1932 Union St.	94123	474-3289		<i>[Signature]</i>
Maya Brouwer	1879 Greenwich St	94123			<i>[Signature]</i>
Paula Pagano	615 Duncan	94131		P.Pagano	<i>[Signature]</i>
Lindsay Chitt	788 Vista Court E	94123	415.722.4800	LChitt@hill-calgary	<i>[Signature]</i>
Kim Barnes	1950ough St 305	94109	415.928.3589	KIM@KIMBARNES.NET	<i>[Signature]</i>
Bryan Ngzwo	387 Lombard	94133			<i>[Signature]</i>
Annie Williams	1360 Lombard St	94133	321.3115	anwilliams@earthlink.net	<i>[Signature]</i>
Julie Swann	79 Pleasant	94109	321.4284		<i>[Signature]</i>
Edward O'Sullivan	1360 Lombard St	94133	321.4363		<i>[Signature]</i>
Alexandra	731 R 2 Ave	94109	214.4292		<i>[Signature]</i>

*REQUIRED

THANK YOU FOR HELPING TO PRESERVE THE MARINA!



RECEIVED
JAN 24 2006
BY: _____

January 19, 2006

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Subject: San Francisco Marina Renovation Project

Dear Mr. Maltzer:

The Bay Trail Project is a nonprofit organization administered by the Association of Bay Area Governments (ABAG) that plans, promotes and advocates for the implementation of a continuous 500-mile bicycling and hiking path around San Francisco Bay. The Bay Trail Project has been actively involved in the environmental review process for the San Francisco Marina Renovation project since October of 2004 when we requested that the impacts to the existing Bay Trail alignment in the project area be considered in the Draft Environmental Impact Report (DEIR).

In a written comment letter submitted on April 14, 2005, the Bay Trail Project requested that the 4,800 linear feet of Bay Trail pathway along the Marina Green between East and West Harbors proposed for restriping and landscaping in the Mitigated Negative Declaration (December 27, 2003) be reinserted into the project description for the DEIR. In addition, the Bay Trail requested that the proposed project address existing serious safety issues in the East Harbor parking lot area in front of the Fort Mason gate. Neither of these issues has been addressed in the DEIR. Since that time, staff has had a chance to visit the project site and would like to provide additional comments regarding the proposed project's impact on the Bay Trail in San Francisco.

West Harbor Issues

The Bay Trail Project believes that private boat-owner parking is not the highest and best use of the waterfront. In the West Harbor area between Scott and Lyon Streets, an existing traffic lane and reserved, private boat-owner parking spaces are separated from the heavily-used Bay Trail by a discontinuous line of concrete curbs. The combination of these curbs and the vehicle lane restricts the Bay Trail to an inadequate width given the intensity of use in this area by dog-walkers, tourists, families, pedestrians, runners, rollerbladers, and cyclists of varying skill-levels. Given that the current situation is substandard and potentially unsafe, the proposal in the DEIR to install a new type of access-control barrier in order to "...make enforcement of

Administered by the Association of Bay Area Governments
1200 California Street, Suite 101
San Francisco, CA 94109
Phone: 415.444.7833
Fax: 415.444.7810

the...parking restriction less labor-intensive" (*San Francisco Marina Renovation Project DEIR*, pg. 23) is concerning. Wood and metal posts, bollards, and pipes already create trail hazards in this area. New barriers should not be installed on this section of trail, and it is our hope that the existing obstacles will be removed as part of this project.

East Harbor Issues

As noted in our first comment letter, it is important that the Final EIR discuss the proposed project in the context of the Bay Trail Plan and policies and identify the impacts to the trail that can be expected as a result of this work. In particular, several significant impacts to the Bay Trail alignment in the East Harbor area will result from the proposed project unless mitigation is identified. As shown on the attached map (Attachment A), boat trailer parking is planned directly on top of the current trail alignment. Reactivation of the boat hoist will obstruct public access to the shoreline trail alignment in this area by introducing trucks with trailers navigating back and forth over the path in order to access the hoist. Additionally, parking control barriers similar to those referenced above in the West Harbor area have the potential to impede the flow of cyclists and pedestrians and to introduce new hazards to an already difficult landscape.

As mitigation for these significant impacts to an existing shoreline recreational amenity, The Bay Trail Project requests that a planning effort be undertaken to address these issues. The planning group should include relevant stakeholder agencies and groups such as the Fort Mason Foundation, the National Park Service, the San Francisco Bicycle Coalition, San Francisco Beautiful, BCDC, Bay Trail Project, and others. Such a study should result in alignment recommendations for the East Harbor parking lot that address user safety, circulation, shoreline experience, and connectivity to Bay Trail segments at either end of the study area. Of particular importance regarding connectivity to adjacent Bay Trail segments is the Upper Fort Mason pathway that terminates at Laguna Street. The confluence of hazards at this location just outside the San Francisco Marina Renovation project boundary indicate that this trail bottleneck and serious safety issue need to be part of any planning effort in this area. **The recommendations resulting from the coordinated planning study should be implemented prior to the commencement of East Harbor water or landside improvements.**

Impacts to the Trail During Construction

The Final EIR must identify, discuss, and potentially provide mitigation for temporary impacts to the Bay Trail during construction. This is particularly important as the proposed construction schedule for the project is three-years long. The one mile section of Bay Trail found within (and between) the San Francisco Marina Renovation project study area is one of the most heavily used of the existing 270 miles of trail in a nine-county region. A three-year construction timeframe will undoubtedly affect users on this already impacted section of trail. Please provide detailed information in the Final EIR regarding potential trail blockages and detours, and what measures will be incorporated to reduce these impacts to a less-than-significant level.

San Francisco General Plan Policies

The DEIR appropriately references several policies and objectives of the San Francisco General Plan, six of which are directly applicable to the Bay Trail. The Marina Renovation Project should examine the proposed project in the context of these policies.

Open Space and Recreation Element

Objective 3: "Provide continuous public open space along the shoreline unless public access clearly conflicts with maritime uses or other uses requiring a waterfront location." The Bay Trail recognizes that the boat hoist is indeed a "maritime use requiring a waterfront location", however, impacts from reactivation of the hoist can and should be identified, discussed, and mitigated.

Urban Design Element

Policy 4.8: Provide convenient access to a variety of recreation opportunities

Policy 4.11: Make use of street space and other unused public areas for recreation

Policy 4.13: Improve pedestrian areas by providing human scale and interest.

Environmental Protection Element

Objective 3: Maintain and improve the quality of the Bay, ocean, and shoreline areas

Policy 3.2: Promote the use and development of the shoreline areas consistent with the General Plan and the best interest of San Franciscans.

Informational/Directional Signage

The project description references new informational and directional signage that is to be installed as part of the proposed project. The Bay Trail Project provides signage free to public agencies and would like to assist the Recreation and Parks Department with the preparation of a signage plan for the Marina. Once an appropriate solution to the circulation issue in the East Harbor is identified, well-placed signage can be an invaluable tool in directing the public to the appropriate areas within the Marina while also providing the best possible shoreline experience. While planning for the East Harbor circulation issues is underway, Bay Trail planners would like to work with the City to install Bay Trail signage along the existing pathway on the Marina Green and in front of the West Harbor.

In Summary, Bay Trail Project requests that the following be included in the Final EIR in order to address significant impacts to the San Francisco Bay Trail:

San Francisco Marina Renovation Project Impacts to the Bay Trail in East Harbor

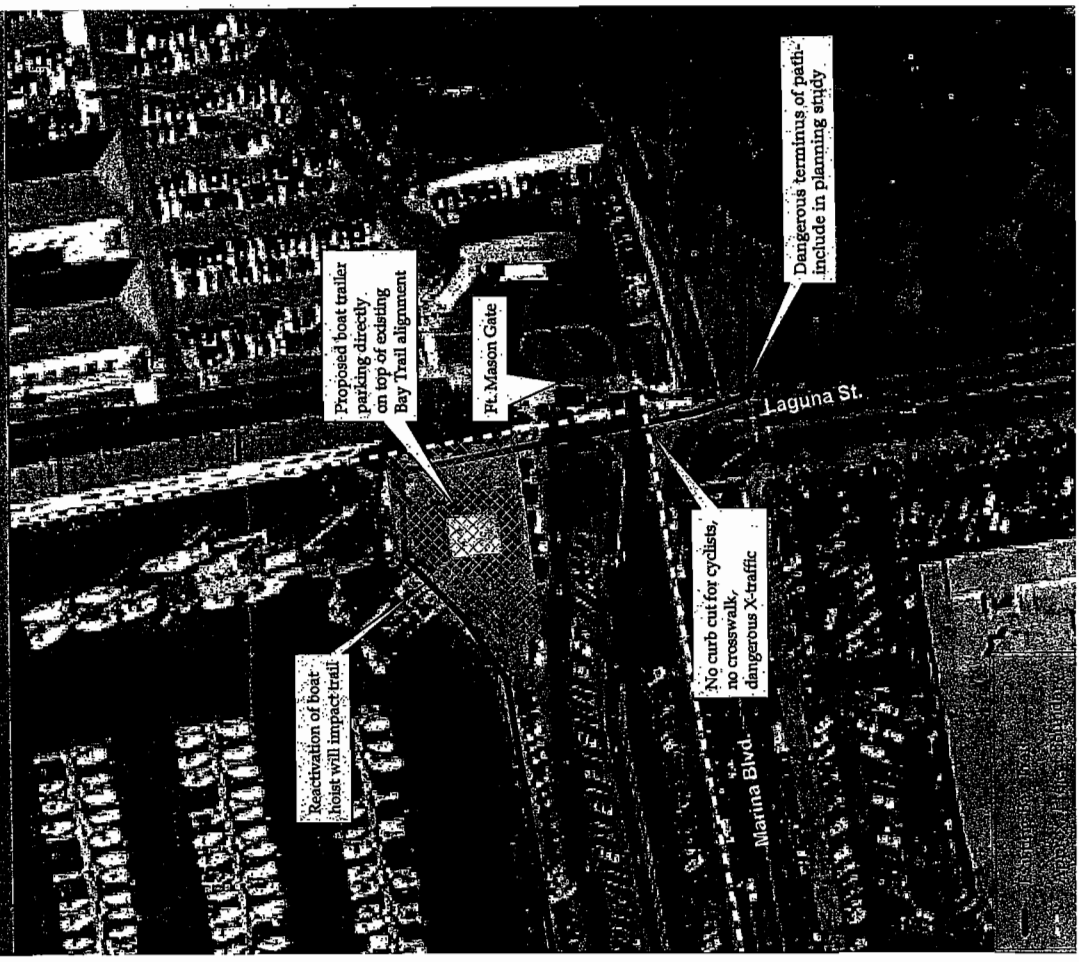
- Reinsert landscaping, striping, and signage improvements to 4,800 linear feet of Marina Green pathway into the project description
 - Private boat-owner parking is not the highest and best use of the waterfront—reconfigure parking and driving lanes in West Harbor so that pathway can be widened for thousands of daily users
 - Remove existing trail hazards such as metal pipes, bollards, and wooden access control structures along Marina Green and in front of the West Harbor: Smooth dangerous pavement irregularities
 - Discuss the proposed project in the context of the Bay Trail Plan and Policies, as well as the San Francisco General Plan, and specifically identify how the project would impact the Trail.
- Finally, as a specific mitigation measure to address impacts to the Trail,
- Provide detailed discussion of construction-related impacts including potential blockages and detours. Incorporate appropriate mitigation
 - **Convene a planning group composed of relevant stakeholders to address circulation, safety, user experience and connectivity issues related to the Bay Trail in the East Harbor area and implement resulting recommendations prior to construction of East Harbor land or waterside improvements.**

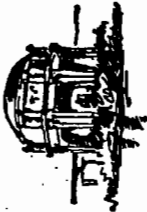
Thank you for the opportunity to comment on this important project. Please contact me with any questions regarding the Bay Trail alignment in this area. I can be reached at (510) 464-7909 or by e-mail at maureen@abag.ca.gov. I look forward to assisting the Recreation and Parks Department with planning and designing an improved Bay Trail alignment along the northern San Francisco waterfront.

Sincerely,



Maureen Gaffney
Bay Trail Planner





Marina Civic Improvement & Property Owners Association

P.O. Box 470790 • Marina Station • San Francisco, CA 94147-0790

January 19, 2006

RECEIVED

JAN 20 2006
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
ADMINISTRATIVE

Mr. Paul Maltzer
Environmental Review Officer
SF Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Re: SF Marina Renovation Project
Case No. 2002.1129E
DEIR Comments

Dear Mr. Maltzer,

I am the author of the Appeal of the Mitigated Negative Declaration submitted to you on February 9, 2004 on behalf of Marina Civic Improvement & Property Owners Association and individually named Appellants. I re-submitted that Appeal to the Planning Commission on October 6, 2005 for further evaluation in the Final EIR, because the issues raised in the Appeal were incompletely addressed in the Draft EIR, specifically:

- Impacts on the Marina Green, an historic resource eligible for listing on the NRHP
- Impacts of West Harbor Breakwaters
- Seismic Issues
- Visual Quality
- Increase in Bay fill without benefit to the general public
- Socio-Economic Impacts
- Impacts of (anticipated) increased Percentage of Power Boats vs. Sailboats
- Impacts of Trailered Boat Storage & Circulation
- Overcrowding at Entrance to Lower Ft. Mason

This letter submits additional comments on the Draft EIR. I request that both these comments and my October 6, 2005 cover letter with the February 9, 2004 Appeal (including attachments and photos) be included in your Comments & Responses document.

1.6

As a tool for decisionmakers, an EIR must be accurate and complete. The Draft EIR does not achieve this standard. The Draft is substantially flawed in its Alternatives analysis, because it does not examine a reasonable range of alternatives to the proposed Project.

10.1

CEQA Guideline Sec.15126.6(a) states: "An EIR shall describe a range of reasonable alternatives to the project ... which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..."

The Guideline further states: "The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives."

The "action" Alternatives selected by the project sponsor/lead agency do not constitute a "reasonable" range of project alternatives. A glaring omission is a Repair & Replace Alternative.

Furthermore, two "action" Alternatives are not substantive alternatives. For example, choosing to analyze an "alternative" which retains all project components except one, viz, demolition of the degaussing station, is not substantially an alternative. Similarly, selection of a "West Harbor Renovation Only" for analysis, without selection of an "East Harbor Renovation Only" for analysis, is arbitrary and incomplete.

The DEIR ignores the mandate of Sec.15126.6(a) which requires that the "lead agency...must publicly disclose its reasoning for selecting those alternatives." The DEIR contains no such reasoning and is therefore incomplete.

10.5

The DEIR does not address other alternatives that may have been considered but ultimately dismissed from further study in the EIR. Such a discussion should have included the reasons for not including them in the EIR.

Unlike the Port of San Francisco which hosted a public meeting on April 6, 2005 to review the alternatives proposed to be studied in the Piers 27-31 Mixed Use Recreation Project Draft EIR, the Marina Renovation Project Sponsor held no such public meeting where alternatives proposed to be studied in the DEIR were disclosed and open to public input. On the contrary, the Marina alternatives were crafted behind closed doors and no member of the public knows why they were chosen.

10.5

Please consider this our request that in the Comments & Responses document the Project Sponsor/Lead Agency disclose its reasoning for selecting each of the "action" alternatives: No New West Harbor Breakwaters; West Harbor Renovation Only; and Removal of Former Degaussing Station. Please disclose other alternatives that were considered but ultimately dismissed from further study and please include the reasons for not including them in the DEIR. Please also include a discussion of why an "East Harbor Renovation Only" was not considered.

10.5
cont

The fact that the alternatives were selected by the lead agency without public input on the range selected is a basic procedural flaw in the preparation of this DEIR. Nevertheless, Marina Civic Improvement & Property Owners Association specifically requested in the scoping process for both Initial Studies that a Repair & Replace Alternative be included in the DEIR. Planning and Rec & Park Commissioners received numerous requests in support of inclusion of a Repair & Replace Alternative; a petition circulated in the Marina neighborhood supports inclusion of a Repair & Replace Alternative; and three Planning Commissioners at the October 6, 2005 hearing opined that it is reasonable to include a Repair & Replace Alternative in the EIR.

A Repair & Replace Alternative would include the following elements:

- * Repair and make replacements as needed to the existing harbor facilities with the existing layout and the existing berth size distribution.
- * Do the necessary dredging and sand mining.
- * No new building construction or building additions.
- * No new additional West Harbor breakwaters; retention of West Harbor moles.
- * Demolition of Degaussing Station and return of the site to open space.

A variation of the Repair & Replace Alternative would include the above elements and construction of the East Harbor breakwater and the permanent removal of berths in the Outer West Harbor (to provide a Marine Sports Basin for kayaking, rowboating, sailing lessons, swimming, etc.)

As compared with the proposed Project, the Repair & Replace Alternative and the Repair & Replace Variant Alternative would remove all negative environmental effects, would be much less costly, and would satisfy the basic Objectives.

10.1

We note for the record that the Port of San Francisco agreed to include an "Alternative D" in its DEIR for the Piers 27-31 Recreation Project specifically and only in response to public request. Alternative D represents the Chelsea proposal which had been rejected by the Port Commission when it gave exclusive negotiating rights to Mills.

We hereby request that the Repair & Replace Alternative and the Repair & Replace Variant Alternative with East Harbor Breakwater and Permanent Removal of Outer West Berths both be included in the FEIR analysis.

Plan Objectives:

The proposed Project calls for removal of Harbor structures, including all docks, fingers, piles, gates, gangways, and moles and construction of all new elements with a different layout and a different berth size distribution (elimination of berths for small boats and significant increase in number of berths for large yachts). Project Sponsor asserts that the rationale for this wholesale demolition and new construction including expansion of the footprint and additional Bayfill is its consultant's report on market demand for berths on San Francisco Bay. That report concludes that future market demand is for berths for larger boats and that there is weak demand for berths for smaller boats.

The consultant's forecasts, however, are directly contradicted by the official forecasting of market demand on San Francisco Bay by the State of California Department of Boating & Waterways. In its "California Boating Facilities Needs Assessment, Forecasts of Boating Activity & Facilities Needs, Oct. 15, 2002" BBW forecasts the exact opposite. Demand for berths under 25 feet will increase and demand for berths over 25 feet will decrease. Thus the proposed Project fails to achieve Objective #3: "Provide a slip size distribution that more closely matches market demand."

It should be noted that many nearby harbors have expansion plans - Treasure Island, South Beach, Sausalito, Cruise Ship Terminal, Piers 27-31, etc. The DEIR should include comments on total SF Bay market demand.

Objective #4 states: "Relocate the Harbor Office to a Site near both the West & East Harbors." It is not disclosed why this is a valid Objective or why moving the Office to the Degaussing site is necessary. Further, it is inaccurate to state that the Degaussing Station site is near the East Harbor.

2.31

2.3

General Plan: The Recreation & Open Space Element states the following: "Maintain the quality and character of the Marina Green." 3.3
 Please discuss the meaning of this General Plan mandate and how the proposed Project satisfies this mandate.
 Please discuss why the Marina Green and Marina Promenade were excluded from the Project boundaries. 3.14

Does this Project require a finding of conformity with the General Plan and with the eight Priority Planning Policies of Sec. 101.1(b)? Why is non-conformity not a CEQA issue?
 Commercial Use:
 For over 70 years, the use of the West Harbor has been strictly recreational, as provided in the State legislation of 1935 which transferred this land and water to the City of San Francisco to be held in trust for the people of California. In July 2005, the Board of Supervisors passed legislation establishing commercial dock fees, thereby establishing a commercial boat use of the harbor. No mention of impacts from such a change of use is evaluated in the DEIR. Please discuss expected impacts in the PEIR. 3.1

Traffic Study:
 It can reasonably be assumed that the significant increase in the number of berths for large yachts in the proposed Project will signify an increase in passenger, guest and crew vehicle trips to the harbor. The new commercial use of the harbor will bring dining cruises and sightseeing boats and other types of commercial boats utilizing the free parking in the lots for passenger pickup and dropoff at the proposed new guest dock. This also may mean a significant increase in vehicle traffic in the area. Ft Mason is predicting a significant increase in visitation and vehicle trips passing through the East Harbor lots to access the entrance to Lower Ft Mason; the addition of a working public boat hoist and new hand boat launches; the installation of so-called parking control gates and as yet undefined parking control system and paid parking; trailered boats being pulled in and out of the parking lots and queuing for use of the hoist; the expected extension of the MUNI E Line, its turn-around in the East Harbor parking lot, together with accommodation of the MUNI 28 Line all point to the need for a traffic study as part of the EIR. 9.11

Oily Water Separators:
 What are the exact location and dimensions of each? What is the exact location of the holding tank under the Marina Green? Please provide a photo or rendering. What measures for the prevention and detection of leaks and spills will be established? What mitigations are proposed? What is the clean-up action plan for leaks and spills? Does this industrial use detract from the quality and character of the Marina Green? 11.15

Objective #2 states: "Protect marina structures from locally generated wind-waves from the north and northeast directions." Project Sponsor asserts that loss of berths in the West Harbor occurred as a result of wave action from the north and northeast directions. This is inaccurate and the DEIR should explore this. There has not been any documented case of loss of berths in the West Harbor as a result of wave action.

The several berths that were lost over time were the result of massive sand encroachment to the south of the St. Francis Spit. This is a direct result of historic lack of routine sandmaking to the north of the Spit, which resulted over time in the movement of the sand around the tip of the Spit and its deposition to the south of the Spit, knocking out several berths in its path. The Marina Renovation DEIR fails to address this issue and relies on Project Sponsor's assertion that additional breakwaters are needed in the West Harbor to prevent berths from being destroyed. New West Harbor breakwaters will do nothing to prevent sand encroachment; the sand will simply be moved to other locations. Sand encroachment can only be prevented by routine sandmaking. 2.32

Construction and placement of additional breakwaters in the Outer West Harbor area will increase sedimentation in areas where currently sedimentation does not exist. This will increase the need for maintenance dredging. This issue is inadequately addressed in the DEIR.

Project Description:
 The Project Description listed on the official Public Notices is incomplete. It fails to disclose key Project components. Please amend the Description by adding disclosure that the Project eliminates 282 existing berths for small boats; adds 3335 linear feet of docks over existing conditions; expands the footprint of the harbor eastward along the Fair's Seawall; and encloses surface water area in the West Harbor Outer Basin. 2.7

The Project Description is inaccurate. It describes the Project as a "renovation." This is a nontechnical term and not found in any City code. It is therefore meaningless. Characteristics of the Project which do have technical meaning are: demolition; new construction; and expansion (of harbor footprint and facilities).

Earthquake Preparedness:
 Planning Code Sec. 101.1(b) establishes the eight Priority Planning Policies that projects should satisfy. Policy #6 states: "That the City achieve the greatest possible preparedness to protect against injury and the loss of life in an earthquake." Please address how the Renovation Project without seismic retrofit of the Seawalls fulfills the mandate of Policy #6. The Seawalls form the boundary of the West Harbor; without them the harbor would be a marsh and not exist as such.

Removal of the north-south Scott Street mole will eliminate important public access to the West Harbor. This mole provides park benches, tree shade, and a public viewing platform above sea level, which enables the public to get close to the boats and also provides important public views outward to Alcatraz and the East Bay hills. It is a very pleasurable spot and very popular with the public at the present time. What will be the mitigation for the loss of this public access amenity? 3.4

Public Benefit:
\$38.8 million of public monies will be spent on this Project, yet the DEIR is unclear as to what will be the benefit of this Project to the general (non-boating) public. Please describe in detail what is the benefit of this Project to the general (non-boating) public. 2.40

Utilities:
The Project proposes to "upgrade electrical service to minimum capacity of 30 amps per berth." Please state the maximum capacity per berth that might be provided by this Project. Please quantify total increased energy consumption over current conditions that might be expected. Please factor in the 24hr/7days a week use of dehumidifiers which is a common practice of large yachts in port. Please also factor in the potential for live-aboards. (live-aboards are currently permitted by the Marina Manager although prohibited by the written Harbor Rules. The Marina Manager has stated that he wants to change the Rules to permit up to 20% of the berths to be occupied by live-aboards.) 11.16

Project Component Specifications:
The DEIR is incomplete because it does not calculate total volume of Bay fill, represented by the two new West Harbor breakwaters, the East Harbor breakwater, the additional piles, and the additional docks over present conditions. Please re-do Table I and present these calculations clearly and in a consistent format for each Project component. 2.33

Re: Table 1 "Proposed Waterside Improvements," p11-8, "Outer Basin Breakwater" - "Proposed Project Improvements":
Please state the exact location of the 150 foot long breakwater perpendicular to the jetty. Please provide the shape and the dimensions of this breakwater, as related to MHT, MLLW and to the bottom. Please express volume of fill in terms of cubic feet. 2.34

Please state the exact location of the 200 foot long breakwater perpendicular to the Marina Green Seawall (Fair's Seawall). Please provide the shape and the dimensions of this breakwater, as related to MHT, to MLLW and to the bottom. Please express volume of Bay fill in terms of cubic feet.

Restripping:
The Project proposes "restripping of existing parking lots," but also proposes there will be no increase in parking spaces. Please define "restripping." Where will this occur? What is the purpose if not to add parking spaces? 9.8

Parking Spaces:
Do the number of parking spaces stated for the East Harbor and the number of spaces stated for the West Harbor include the parking spaces to the north of the Marina Green itself? Are there any parking spaces not included in the stated counts? 9.16

Parking Access Control Gates:
Please specify the location, size, material and design of these gates. Please describe how the system will operate. 9.1

Parking as a Land Use:
The General Plan states that the shoreline is the City's most important natural asset. Public shoreline recreational open space is the most prized category of land use in the City. The General Plan discourages shoreline land uses which by their nature do not require a shoreline location, and encourages such uses to be located away from the shoreline. Parking is one of these. Please describe how parking at the Marina Green as a shoreline land use in public open space satisfies the mandates of the General Plan. 9.17

Historic Resource:
A determination from the Landmarks Board that the Marina Green and the Fair's Seawall are historic resources eligible for listing on the NRHP should be part of the EIR. There should be recognition in the EIR that the two together are the defining characteristic of the Marina District, as concluded in the Carey & Co. report of 2003. There should be more discussion in the EIR of the effects of West Harbor development and expansion (visual and technical) on these historic resources. 5.10

Public Access:
The DEIR states that the proposed Project will construct a public-access path along 500 feet of existing (East Harbor) breakwater. The DEIR thus implies that this breakwater is currently closed to public access. This may be inaccurate. According to the BCDC permit which allowed construction of this concrete structure in the early 1960's, public access at certain hours of the day was a condition of the permit. Since the breakwater is only about three feet wide, public use was limited to a few people leaning against the railing to cast fishing lines. Since we believe public access was required by the original permit, it is inaccurate to state that public access will now be developed as part of the proposed Project. 3.19

The Project Sponsor's "Environmental Review Application" Fall, 2002, Table 3, states: "estimated maximum new fill for both West Harbor breakwaters = 16,000 cu.yds. below MHT and 9,000 sq.ft. at MHT." The DEIR Table 1, p.11-8 "Outer Basin Breakwater(s)" states "10,000 to 15,000 sq.ft. of new fill below MHT." These design quantifications differ by 40% between the two documents. Which is correct? What is the significance of the disparity?

2.35

A description of the exact placement, shape and dimensions of the new West Harbor breakwaters is not stated in the DEIR. It is stated that "the proposed breakwaters are in the design stages." p.11-6

Please explain why final design or detailed design is not required from the Project Sponsor prior to environmental evaluation under the CEQA EIR process. Please describe in technical terms what level of design of these breakwaters is required by CEQA for the environmental review of this Project to be adequate. Please specify to what extent quantifications in final design for any and all Project components can differ or deviate from quantifications stated in the EIR document.

2.4

As an illustration of the problems that can arise for adequacy of environmental review when only preliminary design is required, if the exact placement of the 200 foot long breakwater perpendicular to the Fair's Seawall is not known, then the environmental review cannot determine whether the breakwater will be to the west or to the east of the existing CSO and without this knowledge, the effects of the Project on water quality cannot be evaluated. Another example where environmental review could not be adequate without final design would be the knowledge of the depth to which dredging would have to occur in order to secure the bottom of the breakwaters; without this knowledge, the EIR cannot accurately calculate the volume of new Bay fill. Please comment.

2.1

DEIR Table 1 p.11-8 states that removal of "Inner Basin Breakwater would result in the removal of 12,000 cu.yds. of existing fill below MHT." Please disclose the source of this calculation. Has this calculation been verified by any independent agency.

2.36

DEIR Table 1 p.11-9 "Slip Size" - "Existing conditions". This table differs from the "1997 SF Marina Berth Count - Existing layout," Moffatt & Nichol Engineers, Job No.4857, which is the baseline for this Project. Notably omitted from the DEIR Table 1 are 6 90 foot berths. There are variations in all length categories except 45 feet, 50 feet, and 70 feet. Please explain these deviations.

2.37

Please re-do in its entirety the DEIR Table 1 p.11-9, "Slip Size" - "Existing Conditions" and "Proposed Project Improvements." The revised Table should list current berth size distribution by location, that is, by breaking down the berth size counts to reflect current and proposed conditions in the East Harbor; the Outer West Harbor; and the Inner West Harbor.

2.38

Without such a breakdown of berth size counts by harbor location, the document fails to clarify that currently there are no berths for large boats in the Outer West Harbor, and that the proposed Project would remove all existing Outer West berths, which all happen to be for small boats, and replace them with all berths for large yachts 45 to 60 feet in length. In so doing, the harbor footprint will be expanded to cover thousands of square feet of additional surface water area.

It is in this Outer West Harbor area where the environmental effects from the changed berth size distribution and changed layout will be concentrated. Without this clarification, the DEIR deceives rather than educates.

The DEIR inadequately considers the loss of public open water views currently enjoyed from the Marina Green and from points along the Fair's Seawall, as well as views from the jetty looking south across the Outer Basin toward the Green and toward the Fair's Seawall that will result from the berthing and the east-west orientation of the large yachts with superstructures rising perhaps 30 feet above the water.

4.6

How can we reasonably predict that these will be power boats with large superstructures and not sailboats with thin masts? Because there are precious few 60 foot sailboats on the Bay, and because oily water pump outs are not needed for sailboats,

DEIR Table 1 p.11-9 "Boat Type" states the "anticipated" ratio of sailboats to power boats under the proposed Project will be 63%/37%, the same as current conditions. THIS IS PURE CONJECTURE by the Project Sponsor, and unsupported by any evidence. To the contrary, all the evidence (removing 282 berths for small boats; adding over 225 berths for large boats 35 to 90 feet in length; installing 3 oily water pump outs; and providing a minimum of 30 amps per berth) points to the reasonable conclusion that in fact the Project contemplates a much higher percentage of the rebuilt harbor will be power boats. The DEIR fails to recognize this and evaluate the effects.

2.2

Procedural Issue:

The Marina Renovation Project DEIR was undertaken, prepared and completed in violation of Chapter 29 of the San Francisco Administrative Code which mandated that environmental review of this project be suspended until a finding of fiscal feasibility and responsibility for this project was made by the Board of Supervisors.

Although the Board amended Chapter 29 in July, 2005 to allow the Marina Renovation Project DEIR to be released for public review, that amendment in no way ameliorates the illegality of its preparation. Please comment on this and explain to the public why preparation of this DEIR was undertaken, in violation of Chapter 29. Note: As of this date, the proposed Marina Project has not been found to be fiscally feasible and responsible as required by Chapter 29.

In conclusion, we believe that a Revised Draft EIR which includes analysis of the Repair & Replace Alternative and the Repair & Replace Variant Alternative, and provides revised Tables and clarifications needs to be prepared and recirculated for public review.

Thank you for the opportunity to comment.

Sincerely,

MARINA CIVIC IMPROVEMENT & PROPERTY OWNERS ASSOCIATION

Jean Marie Girardot

Jean Marie Girardot
Secretary

Lisa Gibson, Planner
San Francisco Planning Department
1660 Mission St. 5th Floor
San Francisco, Ca 94103

1/19/06

Re: Comments on the S F Marina Renovation DEIR #2002 1129E

Dear Ms Gibson,

Following are my comments for the record. I support the project and ask that the Commission find in favor of the Project sponsor. I truly believe there is no environmental impact. As a long time berth holder in the Harbor and a former member of the Harbor Advisory Committee to the Rec & Park Commission I have been involved with this project since the mid 1990's.

At the 1/12/06 Hearing I heard a great deal of erroneous information; much of it from well intentioned but misinformed neighborhood residents. Some however came from the primary person in opposition to the project who knows better.

I wish to address two objections raised by opponents:

The suggestion to include Strengthening of the Sea Walls

The presentation by the project consultant showed that seismic strengthening of the walls will not help the movement, spreading, of the fill under the neighborhood. The neighbors are understandably concerned due to the poor nature of the soils under their homes. Virtually everyone would like to see the Sea Walls strengthened. However, that should not be tied to the Harbor Renovation. As you know the Project is to be funded by a loan from state Boating and Waterways which will be paid entirely by the Harbor rents. The City and County does not underwrite nor guarantee this loan. The cost of the Sea Wall work would, no doubt, be many millions, more than doubling the renovation budget. This work is beyond the scope of the Renovation and the cost could not be born by the Harbor fund. Even Joan Girardo has agreed that the cost could not and should not be paid by the Harbor. The Project has minimal connections and effect on the Sea Walls. It would not preclude the Sea Wall work, which would be done on the land side, going forward at a later date when the City could find funding. Attempting to include Sea Wall strengthening in the Renovation Project is merely a political ploy to delay, postpone the project indefinitely as has been the case since 1988.

The request that RPD consider a Repair, rebuild in place option.

This is not an option and would mean no project at all. It would perpetuate the current dangerous conditions. Anyone who has used the Harbors or is familiar with the design of marinas knows that what exists is a poor and dangerous configuration. Dangerous because many slips are exposed to excess surge which routinely damages boats and presents a substantial risk to boaters. Also, because of the north south orientation of most slips, boats are placed beam on to the wind.



19th January 2006

San Francisco Planning Commission
Ms. Linda Avery, Commission Secretary
1660 Mission Street, 5th Floor
San Francisco, CA 94103

Re: Marina Yacht Harbor Improvements - Draft EIR
Case No. 2002-1129E

Dear Planning Commissioners,

Regarding proposed improvements to the Marina Yacht Harbor, the Marina Merchants Association wishes to convey their support on behalf of said improvements and urge the Planning Commission to approve the Draft EIR.

A vital and active Marina not only provides public access to our beautiful waterfront, it also brings business to our neighborhood merchants. When events such as the Moët Cup, the Big Boat Series, YREB Woodies, and others are being held, our local businesses - from hotels to delicatessens - all see a significant boost in business. Not only will the Yacht Harbor Renovation improvements attract even bigger and better events to the Marina, the increased public access to the waterfront will provide our struggling small businesses with an increased customer base over an even broader period of time.

A vital waterfront means a vibrant and vital neighborhood business district, creating increased revenues for the City (from taxes, parking and TOT) as well as providing both residents and visitors alike with a greater selection of goods and services - truly a benefit to all concerned.

We have faith in the experts the City has retained to evaluate the multitude of issues surrounding this project, and urge the Commission to move this project forward - the final EIR of a completed design addressing issues raised to date is the proper place and mechanism for resolving any further issues.

Respectfully submitted,

Mick Suverkrubbe
Mick Suverkrubbe, President

Jordanna Thigpen
Jordanna Thigpen, Vice President

Cc: Supervisor Michela Alioto-Pier
Mr. Brad Gross, SF Harbor Master

*Serving the Marina
for over 75 Years...*

2004 - 2006
Officers and Board:

President:
MICK SUVERKRUBBE
34-0715
Direct: 34-4915

Vice President:
JORDANNA THIGPEN
MARK TALLA
409-7743

Secretary:
DEIDRE ABAUJO
EKLORATORUM
54-1034

Treasurer:
PETER SINGH
CROWN CLEANERS
528-7831

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JAMES G. MAXWELL
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441-1844

Membership Chair:
TILDEN MOSCHETTI
LAW OFFICE OF TILDEN MOSCHETTI
39-5976

Memberships &
Affiliations:



Entering and leaving many of these slips in the strong local winds risks damaging the adjacent boats or injuring a crew member. Most of us berth holders have had this happen in the past. Many inexperienced or older boaters do not use their boats due to this risk. Breakwaters and a reconfiguration are essential to mitigate these dangers.

In the West Harbor the footprint resulting from the existence of the two moles, to be removed in the renovation, is the reason the Harbor was configured as existing. Removal of the moles offsets the amount of fill required for Breakwaters. Without the moles the new open footprint, combined with the breakwaters allows for a much safer and efficient configuration of slips.

The loan requires breakwaters to protect the investment. The only way to rebuild without them in the West harbor would be to retain the moles and eliminate all the outer west slips thereby reducing the number of slips and placing a higher loan burden on those remaining. If the moles are not removed there is virtually no reconfiguration possible without drastically reducing the number further. Since this could not reasonably be done the result would be no mitigation of the dangerous conditions that currently exist.

I wish to take exception to what I believe was a flagrant breach of fair and equal treatment to the public present at the last DEIR Hearing. During public comment on item 17 (RPD response to the 1st Hearing) Ms Girardo was given 10 minutes comment and all others only 3. She was also called to rebut/respond to questions answered by the project consultant. I am a proponent of the project with a great deal of background knowledge thereof, yet I was not allowed more than three minutes - unlike the primary opponent. Ms Girardo was not listed as an expert to testify nor is she on the Planning staff or staff of any other City department. She is a member of the public who should not have received any more deference than the rest of us. Why was this done? I believe the Chair should explain her actions. I would like to know how they could be justified.

Sincerely,

William A Palmer
2261 16th Ave
San Francisco, CA 94116
415 672 0824



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RECEIVED
JAN 20 2006

BY:

19 January 2006

Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
30 Van Ness, 4th Floor
San Francisco, CA 94102

RE: San Francisco Marina Renovation Project
SF Planning Department Case No. 2002.1129E

Dear Mr. Maltzer:

The San Francisco Bicycle Coalition (SFBC) is a 5300-member nonprofit advocacy organization promoting the bicycle for everyday transportation in the city. The following are our comments on the Draft Environmental Impact Report (DEIR) for the San Francisco Marina Renovation project.

1. We find no mention of the City of San Francisco Bicycle Plan (1997, 2005) which defines and describes an official bicycle route (#2) passing through the West Harbor project area, nor do we find mention of the Bay Trail or its Plan, whose adopted alignment passes through, or is adjacent to, both the West Harbor and East Harbor project areas. The Bay Trail and SF Bicycle Route 2, in their existing condition, constitute an important multi-use non-motorized route enjoyed by thousands of people each week, and improvements to this route are a high priority for the SFBC and its partners. 9.1
2. The Bay Trail alignment is a de-facto element of San Francisco's Bicycle Plan and bike route network and as such, injuries and impacts to any portion of the Bay Trail constitute injuries and impacts to the city's bicycle route network.
3. Bay Trail users include daily long- and short-distance bicycle commuters, local day-trippers, residents of the immediate neighborhood, and tourists from around the world, an aggregate constituency of significant size and diversity.
4. Parking and driving space for private boat owners is not the "highest and best use" of the waterfront.
5. The Bay Trail at West Harbor is already too narrow for amount of trail traffic and is loaded with hazards, including a series of curbs running the length of the trail. The project proposes to add barriers to keep unauthorized cars from parking on Bay Trail right-of-way, creating more hazards. 9.2
6. The project should remove safety hazards on the Bay Trail such as pipes, poles, and posts, as well as removing or mitigating railroad tracks. 9.3

7. The proposed boat trailer parking in the East Harbor area will sit directly on top of the Bay Trail. 9.3
8. The project proposes to activate a boat launch at East Harbor, creating truck, car and boat traffic across existing Bay Trail alignment.
9. Renovation of the boat hoist in the East Harbor will significantly impact Bay Trail users as construction and service vehicles cross and obstruct the trail several times a day. 9.4

On these points and others raised by Bay Trail Project staff (with which we concur and join by reference) the SFBC respectfully finds the Draft EIR of the San Francisco Marina Renovation Project to be inadequate and deficient. We are eager to have the Bay Trail serve all of its users, safely, comfortably, and beautifully, and look forward to assisting the Recreation and Parks Department with planning and designing an improved Bay Trail alignment along the northern San Francisco waterfront.

Sincerely,

APM

Andy Thornley
Program Director
San Francisco Bicycle Coalition

cc: San Francisco Recreation and Parks Department
Bay Trail Project

**ATTACHMENT 2A: TRANSCRIPT OF DEIR PUBLIC HEARING
(OCTOBER 6, 2005)**

SECRETARY AVERY: Commissioners you are now on Item number 23, case number 2002.1129e San Francisco Marina Renovation project. This is a public hearing on the draft environmental impact report. And if I could just remind all of you who are leaving that the commission is still in session.

LISA GIBSON: Good afternoon, Vice President Alexander, Commissioners. I am Lisa Gibson of Planning Department staff, this is a hearing to receive comments on the draft environmental impact report for the San Francisco Marina Project - case number 2002.1129e. Staff is not here to answer questions today, comments will be transcribed and responded to in writing in a comments and responses document which will respond to all verbal and written comments received and make revisions to the draft EIR as appropriate. This is not a hearing to consider approval or disapproval of the project. That hearing will follow the final EIR certification. Comments today should be directed to the adequacy and accuracy of the information contained in the draft EIR. Commenters should speak slowly and clearly so that the court reporter can produce an accurate transcript. Also, commenters should state their name and address so that they can be properly identified and so that they can be sent a copy of the Comments and Responses document when

SAN FRANCISCO PLANNING COMMISSION

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ITEM 23

SAN FRANCISCO MARINA RENOVATION PROJECT
 DRAFT ENVIRONMENTAL IMPACT REPORT
 PUBLIC MEETING

OCTOBER 6, 2005

SAN FRANCISCO CITY HALL

P R O C E E D I N G S

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completed. After comment from the general public we will also take any comments on the Draft EIR from the Commissioners. The public comment period for this project began on September 6th, 2005 and extends until 5 P.M. Thursday October 20th, 2005. That concludes my presentation on this matter unless you have any questions. Thank you.

DAVID CINCOTTA: Excuse me before we begin, can I make a suggestion with regard to this? A number of people were intending to speak on the pile of lists that you've got in front of you. About half of those have already gone home, about fifteen or twenty people.

VICE-PRESIDENT ALEXANDER: Ok, but they have an opportunity to make written comment. At this point I'm going to take public comment and I'm going to call speaker cards.

MR. CINCOTTA: I was just going to ask if we ---

VICE-PRESIDENT ALEXANDER: I'm going to call speaker cards, you can speak when you are called. Joan Girardot.

JOAN GIRARDOT: Good evening Commissioners, my name is Joan Girardot, my address is on file. I wrote an appeal to the negative declaration for this project and I am re-submitting that document, and a letter responding to the NOP because it has come to our attention that the

Commissioners have not had the benefit of seeing these documents - and I'm re-submitting them for further evaluation in the EIR.

What we are talking about here is eight blocks of Public shoreline/open space which I believe is the most prized land use under the City General Plan. And I want to say for the record that we all want the harbor to be repaired but in an environmentally sensitive way. We want to get it right because of the importance of this location. There is no public benefit whatsoever from this plan. In fact, the 750,000 San Franciscans who do not own boats but use the park do not derive any public benefit from this plan. My first point is regarding the seismic retrofit of the existing seawalls. I call your attention to page 2-14 of the EIR in which they say "Upgrades to the seawalls are not proposed as part of the project due to the prohibitive cost associated with structural repairs, the project would be funded by a loan from DBW which limits the scope of repairs to Marina use improvements." DBW has e-mailed us that the retrofit of the existing seawalls is eligible for DBW funding but that the City has not applied for it. We have a known and defective public health and safety issue here. On page eight of our appeal we have outlined five documents which categorize that these seawalls will fail in the

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next earthquake by moving four to eight feet towards the water. As citizens we are urging you to recommend that the scope of the project be enlarged to include evaluation of the seismic retrofit of the Marina Boulevard and Fair's seawalls. Please ask me any questions about this later.

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We have another Katrina here waiting to happen. If you go to page 214 and the City says - - They quote a report in 1997 which does not deny the seawalls need retrofit, but they don't quote the earlier studies which they say will fail four to eight feet, and it says they recommended that the City make repairs to the seawalls after an earthquake. In other words the City is going to do nothing. When we get an earthquake and they fail then they will repair them. This is unacceptable, its totally unacceptable and I urge you to recommend that the project scope please be enlarged. The second point I want to make tonight concerns alternatives. As you know, CEQUA demands a reasonable range of alternatives, and in fact regulation 15126a says that an EIR shall describe a range of reasonable alternatives which would feasibly obtain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and it goes on to specify this.

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We have given you here a repair and replace alternative. The city has given you three things: a no action alternative, their plan, and a third alternative that is really a joke because it is the same alternative as the plan except it deletes two breakwaters. All the other elements remain the same. And we have had many neighborhood meetings and this repair and replace project satisfies the first three objectives that they have stated as their objectives. And I would entertain any questions also about this aspect of it. My third point is about--

VICE-PRESIDENT ALEXANDER: Thank you. Sue Chang.

SUE CHANG: I'm sorry. Oh Okay. Hi, my name is Sue Chang. I live at 55 Casa Way apartment 201 in San Francisco. And I am speaking on a couple of things. First of all, I would like to speak out against the removal of the north/south mole at the end of Scott Street. Due to it's location and the deck at the end of the mole, it is a popular access point and it's extremely well used. I guess you guys can't do this, but there is a picture of a couple sitting on the bench there. Because of the north/south orientation of this mole and the ability to overlook the west harbor toward the Golden Gate Bridge, the views can't be replaced and its removal will result

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in a significant impact to the San Francisco Marina. It's wide. It's easily accessible. It makes it especially attractive to seniors and families with young children who may not feel comfortable walking down a gangway or floating dock to one of the new public access points.

I'd also like to talk about the outer west harbor. Currently it consists of 72 berths, 92 of which are either 25 or 30 foot berths. Most of them are sailboats with a relatively low profile as you can see here. In the new project it--88% of the boats will be either 45 or 50 feet. The additional 12% will be 60 foot berths. So with the large expanse of water will (sic) be covered by 350 feet of break water and an adjacent guest dock, significantly larger boats and a significant increase in docks covering the water. The EIR should analyze accurately the number of sailboats verses power boats and how that correlates to the size of the boats. For example, is the yacht occupying a 60 foot berth in the outer most portion of the outer west harbor more likely to impact views than a sailboat. Now this is a boat that I took a picture of today. It's probably bigger than 60 feet, but that's the orientation of what the boat--60 foot boats in the outer west harbor. They are going to be east/west, whereas currently they are north/south. So it

makes a big difference looking straight forward on a boat or looking broadside. There is no evaluation of the views looking back to the city and toward the Marina Boulevard homes from the Saint Francis Spit. This is all open water now. This is where the proposed breakwaters will go. Over

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350 feet of breakwaters will be in that area. And I am not the only one who thinks this is an important view. This is something I found on the Internet. Hopefully you can see that. That's our own San Francisco Film Commission. And that shows pretty much where the breakwaters will be and all that water over there will be filled in with large boats.

I also support that the scope of this project be expanded to include the seismic retrofitting of the seawalls. And I request that the Planning Commission require the repair and replace alternatives suggested by Marina Civic Improvement and Property Owners be evaluated for environmental impacts and its ability to meet the project sponsor's objectives. Thanks.

VICE-PRESIDENT ALEXANDER: Thank you. Gloria Fontanello.* Lois Resano.*
Lois Resano*: Good evening. I have submissions to bring to your attention.

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VICE-PRESIDENT ALEXANDER: Can you state your name please?

Lois Resano*: I beg your pardon.

VICE-PRESIDENT ALEXANDER: State your name please.

Ms. Resano: Lois Resano.

VICE-PRESIDENT ALEXANDER: And your address for the record.

Ms. Resano: 435 Marina Boulevard.

I have some issues to bring to your attention. Our harbor has been a strictly recreational harbor for 75 years. On July 12, 2005, the Board of Supervisors passed legislation permitting use of the harbor by commercial boats, by establishing commercial dock fees. This is a major change of the land use. This legislation allows commercial use by dining cruises, party boats, sight seeing boats, whale watching charters, commercial fishing boats, water taxis etc. We can reasonably expect bus loads of tourists being loaded and off loaded at the project's proposed 200 foot long guest dock at the Marina Green. You must all be so tired of listening to all of this tonight. The impact of this change of use, the foreseeable increase in traffic, noise, congestion, the increased use of the pump-out facilities, and increased intensity of use of the shoreline recreational area must

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be evaluated in the final Environmental Impact Report. The final report must also specify the exact location of these guest docks.

Further in the same legislation the Board established a paid parking use of the shoreline, public parking at \$ 7.50 a day, special events \$ 7.50 a day, trailer and dinghy \$ 7.50 a day. The impacts of this change of use for random parking to a paid operation, combined with the new use for trailer and dinghy parking, combined with the new trailered boat operation at the new boat hoist, must be evaluated in the final Environmental Impact Report. It should be obvious we need a traffic impact analysis to be included in the final report.

I live across the street from the Green. Children play there every day, families, lots of apartment houses around, families use the Green for picnics with hibachis. It's a park - it's not a commercial site.

Thank you for your attention.

VICE-PRESIDENT ALEXANDER: Aaron Roach, Jill Sinclair, Don Wissing.

JILL SINCLAIR: Hello, my name is Jill Sinclair. I live on a very special little block of a three block section in the Marina --

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VICE-PRESIDENT ALEXANDER: Would you state your address?

MS. SINCLAIR: 333 Avila. There's more than 40 children and lots of dogs on a three block stretch in my neighborhood. My comment is this - The Marina Draft EIR is before you today illegally and in violation of administrative code chapter 29. Section 29.5 states:

"The Planning Department shall not undertake environmental review of a project unless a copy of the Board of Supervisors resolution, finding the proposed project fiscally feasible and responsible, is submitted to the Planning Department."

Section 29.7 states: "This chapter 29 shall apply to any proposed project that has not completed environmental review pursuant to the California Environmental Quality Act as of January 27, 2004. In the event environmental review has commenced for proposed projects, the Planning Department shall suspend its environmental review of the project until the Board of Supervisors has determined that the proposed project is fiscally feasible."

No finding by the Board of Supervisors that the proposed project is fiscally feasible and responsible was submitted to the Planning Department and to this date no such finding has been made by the Board of Supervisors. I

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ask you today to suspend these proceedings and postpone this hearing because the project sponsor still has not submitted to the Board of Supervisors the material required by Section 29.3 for determination of a finding of fiscal feasibility.

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I live a block and a half from the Marina Green. I live there because of the Marina Green. I love the Marina Green. Our children play there, we go there every day. I hope that it will not become a commercial space. Thank you.

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VICE-PRESIDENT ALEXANDER: Don Wersing.

DON WERSING: My name is Don Wersing, my San

Francisco address is 445 Marina Boulevard and has been for the past 58 years. I feel the Commission should consider and recommend repairing and making replacements as needed to the existing harbor facilities. With the existing layout and existing berth sizes. I wish the Commission to do the necessary--suggest the Commission do the necessary dredging and sand mining. There should be no new building construction or building additions. No additional west harbor breakwaters and to seismically retrofit the Marina seawall and the Fair's seawall. Thank you.

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VICE-PRESIDENT ALEXANDER: Carina Saparro. Emeric Kalman.

EMERIC KALMAN: Thank you. My name is Emeric Kalman. What I first want to know is the energy(sic) consumption. The draft EIR says a minimum of 30 amps per berth will be provided. It does not state the maximum. What will be the maximum provided to each boat and to the concessionaires?

The project proposes 623 berths. 623 times 30 amps is a huge increase in the consumption and in the current energy used. The project calls for many more berths for large boats. It can be reasonably assumed that these will be power boats mostly and may require 80 to 100 amps per berth. Large Yachts have dehumidifiers going 24 hours a day as well as heaters and are also energy users while boating (sic). Please quantify maximum energy consumption in the final EIR. And also give a figure towards the so called kilowatts per hour necessary for the new harbor.

The second point is the project proposal objective number 3B states "provide a slip size distribution that more closely matches market demand." I want to state categorically that the proposed project does not achieve this objective. In fact it proposes the exact opposite. The project sponsor would have you believe that they are eliminating 282 berths for small boats because market

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demand is for berths for bigger boats. The opinion of the consultant, who did the studies and the paper work of Moffatt & Nichol should be set aside. They are (indiscernible) contractor who designed the project also wants to be down and build this project. Naturally they want the biggest project possible to make more money on it. Changing the berth size distribution requires changing the layout which requires moving all the pilons. This makes even a bigger project.

More importantly the consultant's opinion is directly contradicted by official forecasting done by the State Department of Boating and Waterways. According to their (indiscernible) assessment, dated October 15, 2002, berthing demands for boats 20 to 25 feet in length will significantly increase in the San Francisco Bay by 2020. Thank you. But demand will decrease larger boats.

VICE-PRESIDENT ALEXANDER: Thank you.

MR. KALMAN: Thank you.

VICE-PRESIDENT ALEXANDER: Eleanore West. Betty Rosenthal. Salene Wong. Mary Mackafie. Gale Steiner. Suzanne Lifson. Renee Monsharts (phon)

SUZANNE LIFSON: My name is Suzanne Lifson and I am the Director of client services at Fort Mason Foundation. So I am here on behalf of them as well. I spoke with the

National Park Service who asked me to send along their comments. Both of us will be sending written points by the 20th of this month, but they asked me to come today.

So, good evening Commissioners. A couple of concerns, I'll start with Fort Mason Foundation. Of course, the Fort Mason Center is adjacent to the project. Our concerns include the Muni E-line extension that we're working on; the work already under way on Pier One that the National Park Service and the Fort Mason Foundation have some near-future plans for; seismic retrofitting etc.; traffic circulation and noise - this area is also adjacent to the conference center and gate house which is rented out often to the community. So that's a concern that events and meetings are not interrupted. The pile driving and the noise levels associated with that.

I will mention that the Park Service said that in their opinion the report has not documented through any studies or engineering analysis that the project will not have negative impacts to the Marina side caissons of structure Pier One. And that they have hired URS, an engineering firm familiar with the pier to review the report, study the pier and potential impacts of the project, and its pier review findings will be contained in the NPS response they sent on the 20th.

Thank you.

VICE-PRESIDENT ALEXANDER: Rene Monchatre.

RENE MONCHATRE: Good evening commissioners. My name is Rene Monchatre, vice president of the Harbor Tenants Association. We represent the boaters down at the Marina. My address is on file.

Our first concern is with any change to the degaussing station. Under the proposal they intend to spend two million dollars to turn the degaussing station into a harbor office to give the harbor master a better view. I think two million dollars is way too much to give somebody a better view.

The EIR report is flawed. On page 23 it says "the number of parking spaces will remain the same." When they eliminate the east-west mole behind the harbor master's office it contains 15 parking spaces, including two handicap spaces and those probably are the most used because they are in a secure area. Those are eliminated, they are not addressed in the report. When you convert from smaller boats to larger boats, small sailboats have one to two person crews on it. Big power boats have four to six to ten people on it. You're going to have increased people coming in. Where are they going to park? You're eliminating parking spaces and you got

increased number of usage. Also, with the planned boat ramp. This will be the most desirable boat ramp in the Bay Area, it's right next to the Golden Gate bridge. You've eliminated all the 24 foot boats so they're going to be using the boat ramp. So where are all these boat ramp people going to park? Right? You're eliminating spaces. So it does have some serious parking impacts. And for a minute, think about what you're doing when you're replacing these small twenty foot boat with big 44 foot power boats, three story Bayliners with twin V8 engines and to keep them running they've got to run them engines once a week to keep the engines maintained. You're going to run two engines on each boat times two hundred boats, four hundred Diesel engines V8 are going to pollute the Bay. And it's not going to have an environmental impact? I beg to differ with you on that. It's going to be a hundred percent more pollution. I don't think it's adequately addressed in this situation here.

Lastly, the harbor tenants are definitely opposed to this grandiose plan that they got of 30 million dollars. It's going to affect the environment and the people that are using it. Today we have a place that is affordable for working people in San Francisco. We have teachers down there, we have carpenters, electricians,

longshoremen using that facility. When you put through the one hundred and something percent rent increases which they already put through 70%, they're planning to come back with more, all the working class people are gonna be gone and you're gonna have just the rich and affluent. Working class people can't afford to buy a house, now you're taking away the recreation. This plan is flawed. I ask that you send it back and have something more economical. Thank you.

VICE-PRESIDENT ALEXANDER: Nathaniel Berkowitz.
NATHANIEL BERKOWITZ: Good evening. My name is Nathaniel Berkowitz and I appreciate the fact that the Commission has stayed awake this long to listen to a very dull subject. But the yacht harbor really isn't dull and I want you to be enthusiastic about it. It's a unique piece of property, it's a jewel in the city's assets, it fits in the same category as this building does. I think it is important for it to get more care, more attention that has been given to it heretofore. I speak, having been a tenant at the yacht harbor since 1964. I have a sailboat. I have been able to sail it in and sail it out for 30 years with nary the use of an engine. If we build these new seawalls that they are calling for in the West harbor, no longer will that be possible. Then you have

to motor it in. I have ten points that I'm going to include in a written report to you, but I would like to state that the Moffatt and Nichol study is severely flawed and it was simply a computer model, and is not significant to solve and to do any planning with. I would like for you to give the yacht harbor some attention and I think the first way to start with that is to send this EIR, the draft EIR, back for restudy and a new plan. Thank you very much, gentlemen.

VICE-PRESIDENT ALEXANDER: Judith Berkowitz.

JUDY BERKOWITZ: Commissioners, Judy Berkowitz, Coalition for San Francisco Neighborhoods. On the 28th of September the Executive Committee of the Coalition for San Francisco Neighborhoods voted unanimously to accept two resolutions. The first is to recommend that the scope of the Marina Harbor Project be expanded to include the seismic retrofit of the Marina Boulevard seawall and Fair's seawall. The second resolution urges the Planning Commission to recommend to the Recreation and Parks Department to retain all 282 berths for small boats at the Marina Harbor.

Thank you very much.

VICE-PRESIDENT ALEXANDER: Is there anyone else desiring to comment on the draft EIR.

DAVID CINCOTTA: My name is David Cincotta of Jeffer, Mangels, Butler and Marmaro, representing a number of neighbors, some of them had to leave today and I would like to suggest, if there is a possibility to have a future hearing and have an extended comment period which would be beneficial because a number of these people have considerable knowledge for years about this area and have read all of the background materials and studies with regard to this. I don't want to waste my time on that request. I do want to say that here's where some of the areas I think are really flawed and we will be submitting additional written comments.

The scope of the project is seriously flawed and you've heard it from a number of people already. It does not include the seismic retrograde for the seawalls, the Marina seawall and the Fair's seawall. Both of those seawalls are identified as potentially significant historic elements and yet, the study does not find any significant, potentially significant environmental impacts. Even though the study also says that these seawalls, if they are not protected and they do collapse, they will create liquefaction problems and vibration problems that will collapse the entire seawall, the Marina and piers. The scope of development is still

incomplete as well, because it doesn't even study how they're going to attach the breakwater, nor does it say where they're going to attach it. These are things, if a developer came forward with this and said we don't know how we're going to do these things, you'd throw them out of here. The final design they say they're going to do quantitative wave modeling and then decide where they're going to put it. What that means is that they're going to stand there and look at it and see if it is starting to give during the pile driving. Then they're going to do something. It literally says that in the mitigation measures. But mitigation measures, most of them don't mitigate anything. They ask people to look at them. It's just atrocious. The alternative that is not in here as well, the repair and replace alternative, it seems so natural and obvious you have a non-project alternative, you have the preferred alternative, and you have the repair and replace what's there alternative. But it's totally eliminated. I think you have to insist that that be included.

I'm just coming up to speed on this material in the last few weeks. These people have lived with it. They asked you last fall to require this EIR. Here was so much information then that they convinced this commission

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to do that. I suggest that you give them a little more time to come back and give you oral testimony about a considerable amount of reports that exist here. I also suggest that you extend the comment period, even though we will do everything we can to get all the written materials to you as well. Thank you for your time and attention.

VICE-PRESIDENT ALEXANDER: Thank you.

FRANCISCO DeCOSTA: Commissioners, my name is

Francisco DeCosta, Director Environmental Justice Advocacy. I work for the National Park Service and the Army at the Presidio and I am very well acquainted with this area. First and foremost let me state to the commissioners, this is a flawed draft environmental impact report, because it does not address quality of life issues. As has been stated by a number of speakers today, that area will have added pollution. A lot of constituents from the San Francisco area go to that area for recreational purposes. They should not be visiting that area so that they be adversely impacted by the pollution.

And the second reason why this thing should be revisited, this project should be revisited is because we need to have a full scale engineering model done on that

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area that addresses liquefaction. This is very important. We should learn a lot from what happened in 1989. And if you are not paying attention to that then I think Commissioners we are not doing just by this project. Thank you very much.

VICE-PRESIDENT ALEXANDER: Thank you. Is there anyone else wishing to comment?

Marilyn Ameanie: Marilyn Ameanie; San Francisco resident. The seismic retrofitting of the seawall is required is known. Dredging without retrofit will further destabilize the seawall. I support the request that the project scope include evaluation of seismic retrofit of the seawall to render the EIR adequate and accurate.

Develop this property for commercial interest? This is a public jewel and it shouldn't be converted to private benefit. The greens will be well populated this weekend with fleet week. The greens are used constantly, daily. July 4th is another big weekend. But the most important issue is the adequacy and accuracy of the EIR and there are issues that should be addressed that haven't been addressed yet. Thank you.

VICE-PRESIDENT ALEXANDER: Thank you. Is there any other public comment? At this time we will close the public hearing. I'm sorry it stays open until the 20th.

SECRETARY AVERY: The oral public hearing is closed, but the written public is open for two more weeks until five o'clock on the 20th of October. But you should open it up for Commission.

COMMISSIONER ANTONINI: Well I share a lot of the concerns that were voiced tonight and I also would be receptive to an additional night for public comment if that's possible. We could explore that. But let me--I just sort of agree that one of the things you have to do with an environmental impact report is to explore the different alternatives and as been mentioned, alternative one is doing nothing, and one is the plan and I don't think enough attention is given to some of the alternatives which keep the present configuration of verse in place and merely do the dredging and of course seismically retrofit the seawalls. And with that you know I think that has to be adequately addressed. But most of the other comments have been made in regards to, you know I think talk about the commercialization and things is important but we start getting into a point where we're talking more about the project than the environmental impact of it. And I think the important thing to note at this time is that whether or not this increased seawalls

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is an opening for commercialization. Certainly there are other ways that it could be done and I don't know if those ways have been analyzed adequately in this document. So, I will hear what other Commissioners have to say. I don't know what the possibility of having a second public hearing on this is.

VICE-PRESIDENT ALEXANDER: Commissioner Bradford-Bell.

COMMISSIONER BRADFORD-BELL: Well, I think - I don't see any need for a second oral hearing because I think the ability to put them in writing by the 20th is adequate, because I intend to put all mine in writing because I can't say them all tonight. I have been accused of being like Commissioner Hughes - I'm going to be brief, as you say. I am extremely troubled by this EIR and part of the reason I'm troubled by it is - I honestly can't remember any other EIRs - I think Home Depot, I can think of Golden Gate Park Concourse - there was always a design that was included as a part of it.

Even with the Concourse we had, you know, the design of the tunnel so that we knew what was going to happen to that historic piece of it. But here its vagaries around is going to be a maintenance building that is "it's going to be something like this and something like this" and

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it's going to be this redesign to the harbor master; we have some interior but no exterior. There is something to the degaussing station."

So I'm going to go to just some brief things that I have and I'm going to submit the rest of mine in writing, but to start here: "The EIR indicates that the project is located in an area that would be subject to strong ground shaking and potential liquefaction" which we've already heard. However, two investigations could only conclude that while this would occur, it would not be economically feasible to construct ground improvements to reduce liquefaction. Well, that in itself is a reason to me for us not to approve it. You're telling us that it is dangerous, but it costs too much money not to be dangerous, so approve it anyway. I, in good conscience, couldn't do that. Clearly, the Fair's seawall and the Marina Green issues would be a problem. In the EIR it addresses these issues independently but it doesn't look at accumulative impact of ground shaking on the area were they all to happen at one time.

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As part of this seismic instability, I think, should be better addressed relative to the seawalls.

Construction of the seawalls and an ADA ramp, a new floating dock is determined it could potentially damage

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or substantially alter the Fair's seawall, including its sloped cobblestone face and possibly one of its stone staircases, both of which are considered character defining features. Additionally, the EIR indicates the potential impact to the Fair's seawall could be damaged from exposure to wave action due to removal of the north/south mole at the foot of Scott Street. Under these circumstance I believe that the need for the seismic upgrade is even more important. A review of potential harm to the seawalls from seismic activity should be more thoroughly addresses and a design should be part of the EIR for the Commission's review of this EIR.

The need for test pile program is mentioned in the EIR because of the specific vibrations related impacts to Pier One that cannot be quantified until a further design detail is provided, which is not in this EIR. So I believe the design and analysis should be part of the EIR because the EIR states a geo-technical investigation would determine if an alternative pile type or installation method would minimize vibration and/or liquefaction hazards. So the design and the test pile program analysis I believe should be a part of the EIR.

I find it extremely contradictory, and I would like to see it addressed, why the determination by Moffat and Nichol engineers that the increase in extenuated wave load would be well within the structural capacity of Pier One when it is stated in the EIR that is an unknown factor, considering we have no design. So I find that it causes me to question the engineering study that has been provided, because it is contradictory to what they say can happen. I think a study and review by the Office of Emergency Services would be appropriate within the EIR, because of the life safety issues of the project. Just as engineering studies are provided as a part of this EIR, I believe, a target hardening or a natural hazard study is necessary by OES given the high risk of loss of life that could be caused in a disastrous situation. Why isn't the City's OES needs, why are they not identified in this EIR, particularly when we're talking about seismic activity.

Chapter 5, growth inducing impacts, indicates the project would not construct new housing, nor would it permit live-aboard or houseboats within the Marina as is the current policy. So my question is, is this removal of live-aboard and houseboats, the removal of housing,

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and if so, shouldn't there be some analysis of replacement housing for the tenants. Or, is this speaking of more transient use such as Bed and Breakfast and private vacation rentals, which I understand are not allowable commercial enterprises in the harbor, in the Marina. However, if they are then I think this creates a situation where the loss of income to the City in terms of tax collecting fees should be addresses. But either way, I think, that whether it is the loss of permanent housing or the loss of hotel Bed and Breakfast type of housing, that either way, the needs need to be more clear. What is this live-aboard housing we're talking about, and how do they intend to mitigate the impacts of it. EIR determines the overall visitation is not expected to be substantial, which seems contradictory to the projects need for additional toilets and showers and it supports a revised alternative. I don't understand why you need to build a new 1000 square foot maintenance facility on what's designated open space and abandon a 1500 square foot building to do so. There is no rationale to the need for doing that. And there is no -- even in alternative D if you were not to build for instance move the Harbor Master's office to the degaussing station. I am troubled by the fact that it gives the recommendation

10.2

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to tear it down. It's good enough to keep it unless you don't let us move in there and then it has to go. Doesn't sound like a sound recommendation as part of these alternatives and it does have some level of significant - historic significance so therefore it should be looked at as something that would be saved. The Harbor Master-it says an alternative D that if the Harbor Master's office is not moved, the most we are going to lose is 100 square feet of new toilets and bathrooms that will happen. Well, if you only need 1000 square feet of maintenance space and you have a 1500 square foot building you are abandoning, then it seems to me that it could be accommodated in that without any additional building on the property. And I certainly don't understand the rationale when the EIR clearly states that there will be no increase in traffic of users on the facility why we need to take away designated open space to put in toilets and showers for a group of people that are never going to show up according to their own EIR.

10.3
cont

Which also I think, does not address -and I will make this last- it doesn't address traffic impacts. You are going to take 24 boats out of the water. They are going to become put in and take out boats and that potential traffic impact of cars pulling trailers along

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the Marina Boulevard I don't think are addressed. You are also going to -- they are also going to repair the boat launch docks at both harbors which is going to increase the number of people that come there just to boat launch, not to use the trailer launch where it holds 24 trailers, but to bring their boats over and launch them there. It doesn't do an analysis of what that increase would be. It doesn't do any kind of traffic impact on that. And so I am troubled by that.

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But I guess the bottom line is that I am troubled by the whole thing. We are designing buildings that we don't indicate why we need them. I think the mitigation measures are far too vague. Of course you are going to do what the standards say. That's what everybody does. So to say we gonna do what's standard, I think, is completely inadequate for the document. I believe more analysis needs to happen in terms of the use of the facility and I believe it begins with a seismic retrofit.

The rest I will put into writing for staff.

VICE-PRESIDENT ALEXANDER: Thank you, Commissioner Lee.

COMMISSIONER BILL LEE: What I'd like to do is, to refer the historical issues to our own Landmarks Board and have them take a look at it. In section 3C-7 you

5.2

mentioned here there is a rating of 7-J. It was received by the State Office of Historical Preservation but not yet evaluated for the RHP. But I think more importantly, to reset the process and go through our own Landmarks Board to see if the seawalls are historical or what level of historical it should be. I think, secondly, we should have a second hearing to invite Rec. And Park to discuss the issue of why aren't they included in the scope of the seawall. I know Joan, you have been involved with the seawall upgrade for I don't know how many years since you have been complaining about, suing the City. But I think that is an issue for Rec. And Park, they make decision on priorities there, but I think it is very important - I'm on - unless you turned me off. Alright, and I think the issue here, having Rec. And Park here, for them to give to the Planning Commission their priorities. You are building new berths, but after the 89' earthquake, I was down there and I saw the percolation on the Marina Green.

So we know the soils are unstable there so its going to have an environmental impact and there is a good - 60% chance we'll have a major earthquake here in the next 30 years.

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So, the next issue I think we have to look at is the a - If you have larger boats, you are going to have traffic impact because you have to sometimes take the boats out of the water. Secondly, the surface area of a large boat - - with the bottom of the boats they always use Phalates or they used to use Chromium, and they were toxic and you have to have somewhere to repair them. So, if you have a larger boat and you have a larger surface area, and you increase the size of it , and you take the small boats off, you are going to have more or some sort of water pollution there. And so, I think the - - when you look at the environmental impact, I do support what the coalition wants here, to remain - - to have the small boats, if you keep the small boats you will have to re-do the EIR, I was thinking that, but since they are asking for larger boats, I think there has got to be a mitigation measure or there is going to be some sort of impact. And then you got more of the harbor traffic because larger boats are tougher to steer than smaller boats, do you increase the rate of accidents there? Second, with the Harbor master issue here - and the bathrooms, with larger boats are you going to expect a higher number of people going there, and would bathrooms be used more often. So because of my concerns and - I

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don't think I am a boating expert, we need to get boating experts to come up here to talk to us, and also ask Rec and Park to come to us the same. While I understand your need to upgrade the berths and to generate funding but, what was the decision logic or what for actually fixing the seawall because we will have another earthquake and we don't have a mitigation measure for that now. So, my recommendation is to extend the time for public comment. Secondly, also have a second hearing and invite Rec. And Park. Thirdly, to have the historical certification issue sent to our own Landmarks Board for their interpretation of it and for them to review it and send us their recommendations, and to finally, I think here -- is to - - at our next meeting to still continue the draft EIR and take public comment. Thank you.

VICE-PRESIDENT ALEXANDER: I just want to make a few comments, I know the hour is getting late and I don't want to spend a bunch of time but I think there, in short the EIR, the draft EIR is inadequate and really fails to address key and important points and I think some of those have been pointed out here by people who testified and some have been pointed out by other Commissioners. I have my own series of issues with the EIR. I don't want to sit and draw on and go through them. But I think I

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would definitely be supportive of extending the public comment process. I don't know that I want to do another hearing, but I definitely want to extend the public comment process and my thought is to at some point in November, November 6th, first week in November. Do we have November 3rd? For written comments? Yes, that would be for written comments.

COMMISSIONER BRADFORD-BELL: That would be fine but in doing that it would seem to me the purpose for it would be to offer an opportunity for another hearing as Commissioner Lee talked about.

COMMISSIONER BILL LEE: Plus we need the Landmarks Board take a look at it for the historical significance of the seawall.

VICE-PRESIDENT ALEXANDER: Ok, so perhaps we should calendar another hearing for this - Early November?

SECRETARY AVERY: So would you like to have another public hearing on this item for instance, November 3rd, with the invitation to Rec. And Park and to the Landmarks Board for their comments on the areas that were outlined by Commissioner Bill Lee and maybe extend the written comment period to the following hearing, the 10th of November.

COMMISSIONER BILL LEE: Sounds good.

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VICE-PRESIDENT ALEXANDER: I think that is the consensus of the Commission. Do we need a motion to do that?

SECRETARY AVERY: This is a non-action item so I will be taking the direction from the Chair.

VICE-PRESIDENT ALEXANDER: You're taking the direction from the Chair that we would calendar a public hearing?

SECRETARY AVERY: Very good, this item will be continued for another public hearing on November 3rd with the invitation to Rec. / Park and the Landmarks board and public comment period, written public comment period will be extended to five p.m. on the following Thursday, I believe that is November tenth. With that Commissioners we are finished with this item.

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**ATTACHMENT 2B: TRANSCRIPT OF DEIR PUBLIC HEARING
(JANUARY 12, 2006)**

SAN FRANCISCO PLANNING COMMISSION PUBLIC HEARING

P R O C E E D I N G S

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1
2
3 **LINDA AVERY:** ITEM NUMBER 17, 2002.1129E, SAN FRANCISCO
4 MARINA RENOVATION PROJECT. THIS IS AN INFORMATIONAL
5 PRESENTATION BY THE PROJECT SPONSOR TO ADDRESS COMMENTS
6 REGARDING THE SCOPE OF THE PROPOSED PROJECT RAISED BY THE
7 PUBLIC AND THE PLANNING COMMISSION AT ITS OCTOBER 6 HEARING ON
8 THE DRAFT EIR.

9 **Lisa GIBSON:** GOOD EVENING, PRESIDENT LEE,

10 COMMISSIONERS, I'M LISA GIBSON, PLANNING DEPARTMENT STAFF.
11 THIS IS AN ITEM WITH AN INFORMATIONAL PRESENTATION BY THE
12 RECREATION AND PARK DEPARTMENT CONCERNING THE
13 PROPOSED SAN FRANCISCO MARINA RENOVATION PROJECT, CASE
14 2002.1129E.

15 THIS HEARING IS BEING HELD TO RESPOND TO COMMENTS
16 REGARDING THE SCOPE AND MERITS OF THE PROPOSED PROJECT THAT
17 WERE RAISED BY THE PUBLIC AND THE COMMISSION AT THE OCTOBER
18 6, 2005 HEARING ON THE DRAFT ENVIRONMENTAL IMPACT REPORT. AT
19 THE OCTOBER 6 HEARING, WE HEARD MANY COMMENTS THAT DID NOT
20 CONCERN THE ADEQUACY OR THE ACCURACY OF THE DRAFT EIR. THESE
21 COMMENTS INCLUDED COMMENTS REGARDING WHY THE PROPOSED PROJECT
22 INCLUDED CERTAIN IMPROVEMENTS SUCH AS INSTALLATION OF NEW
23 BREAK WATERS, WHILE IT DID NOT INCLUDE OTHERS, SUCH AS THE
24 SEISMIC UPGRADE OF FAIR'S AND MARINA BOULEVARD SEAWALLS.
25 COMMENTERS ALSO RAISED QUESTIONS ABOUT THE NEED FOR THE

DRAFT EIR OF THE

SAN FRANCISCO MARINA RENOVATION PROJECT

CITY PROJECT # 2002.1129E

ITEMS 17 & 18

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January 12, 2006

San Francisco City Hall

Official Reporter: Adrian Edler

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1 PROJECT. AND THE COMMISSION HAS EXPRESSED THEIR WISHES TO
 2 HEAR DIRECTLY FROM THE RECREATION AND PARK DEPARTMENT ABOUT
 3 THESE MATTERS. THAT IS THE PURPOSE OF THIS INFORMATIONAL
 4 PRESENTATION. PLEASE NOTE THAT THE INFORMATIONAL PRESENTATION
 5 WILL NOT ADDRESS COMMENTS REGARDING THE DRAFT EIR ITSELF.
 6 THOSE COMMENTS WILL BE RESPONDED TO IN WRITING BY THE
 7 PLANNING DEPARTMENT IN A COMMENTS AND RESPONSES DOCUMENT
 8 WHICH WILL ADDRESS ALL VERBAL AND WRITTEN COMMENTS RECEIVED
 9 ON THE DRAFT EIR. WE ASK THAT MEMBERS OF THE PUBLIC AND
 10 COMMISSIONERS WHO WISH TO COMMENT ON THE ADEQUACY OR ACCURACY
 11 OF THE DRAFT EIR DO SO DURING THE NEXT ITEM WHICH IS A
 12 CONTINUANCE OF THE DRAFT EIR HEARING HELD ON OCTOBER 6, 2005.
 13 PLEASE ALSO NOTE THAT THIS IS AN INFORMATIONAL HEARING
 14 ONLY AND NOT A HEARING TO CONSIDER APPROVAL OR DISAPPROVAL OF
 15 THE PROPOSED PROJECT. AFTER THE INFORMATIONAL PRESENTATION,
 16 WE WILL TAKE COMMENTS FROM THE GENERAL PUBLIC AND THEN THE
 17 PLANNING COMMISSION. THAT CONCLUDES MY PRESENTATION ON THIS
 18 MATTER AND UNLESS THE COMMISSIONERS HAVE ANY QUESTIONS, I
 19 WOULD LIKE TO INTRODUCE YOMI AGUNBIADE, THE DIRECTOR OF THE
 20 RECREATION AND PARKS DEPARTMENT TO BEGIN THE INFORMATIONAL
 21 PRESENTATION. THANK YOU.
 22 **YOMI AGUNBIADE:** GOOD AFTERNOON, PRESIDENT LEE,
 23 COMMISSIONERS. OKAY. YOMI AGUNBIADE I'M THE GENERAL MANAGER
 24 FOR THE RECREATION AND PARK DEPARTMENT. I JUST HAVE A SHORT
 25 SET OF SLIDES TO GO OVER WITH YOU. AND ALSO JOINING ME TODAY

1 AS MY SECOND SLIDE WOULD BE MR. FRANK ROLLO, ONE OF THE
 2 ENGINEERS WHO HAS WORKED EXTENSIVELY IN THE MARINA, PROBABLY
 3 FOR OVER A DECADE, NOW WORKING ON THE PROJECT. HE'S GOING TO
 4 TALK ABOUT SOME OF THE QUESTIONS BROUGHT UP AROUND THE
 5 SEAWALL AND I'LL COME BACK AND I'LL CLOSE. AGAIN, MY
 6 PRESENTATION IS JUST SHORT. I WANT TO KIND OF GO OVER SOME OF
 7 THE REASONS WHY WE ARE DOING THE PROJECT, TALK TO YOU A
 8 LITTLE BIT ABOUT THE FUNDING FOR THE MARINA, FUNDING FOR THE
 9 PROJECT, AND ALSO AT LEAST TRY TO RESPOND TO SOME OF THE
 10 COMMENTS THAT I THINK CAME AT THE HEARING THAT WAS CONTINUED
 11 FOR TODAY BECAUSE THERE ARE SOME COMMENTS THAT HAVE TO DO
 12 WITH THE PROJECT. SPECIFICALLY THERE ARE COMMENTS THAT HAVE
 13 TO DO WITH JUST OUR ONGOING OPERATIONS OF THE MARINA. SO I
 14 KIND OF WANT TO TAKE THE OPPORTUNITY, AND I THANK YOU FOR THE
 15 OPPORTUNITY TO SEPARATE THOSE TWO THINGS.
 16 I THINK AS STAFF HAS SAID, THERE IS A HEARING LATER ON,
 17 AND WE LOOK FORWARD TO RESPONDING IN WRITING WITH YOUR STAFF
 18 TO THE DRAFT EIR. SO, WE ARE HERE TO TALK ABOUT THE MARINA
 19 RENOVATION PROJECT AND, OF COURSE, THE DRAFT EIR.
 20 AND JUST TO GET OUR BEARINGS, WHAT WE HAVE HERE. HERE IS
 21 THE HARBOR IMPROVEMENTS. WE HAVE THE EAST HARBOR AND THE WEST
 22 HARBOR IS WHERE THE WORK IS GOING TO BE. I'LL BE TALKING A
 23 LITTLE BIT LATER ON ABOUT SOME ONSHORE IMPROVEMENTS AND ALSO
 24 WHEN THE HEARING HAPPENS, I ALSO THOUGHT IT WOULD BE GREAT TO
 25 PUT THIS ON HERE SO YOU WOULD SEE IT.

1 WE'VE GOT AN EAST HARBOR REST ROOMS, THE DEGRAUSSING
 2 STATION OVER HERE, AND THE HARBOR OFFICE. SO, REALLY THE
 3 FIRST QUESTION THAT I WANT TO TRY AND ANSWER IS WHY EVEN
 4 RENOVATE THE MARINA AT THIS POINT. AS THIS SLIDE SHOWS, THE
 5 FACILITY IS OVER 40 YEARS OLD.
 6 THE WEST HARBOR WAS ACTUALLY CONVEYED TO THE DEPARTMENT
 7 OR THE CITY IN 1935 BY A STATE STATUTE. AND I'LL TALK ABOUT
 8 THAT A LITTLE BIT LATER. OF COURSE, OVER THE YEARS LIKE
 9 ANYTHING WE BUILD THAT HAS GONE BEYOND ITS USEFUL LIFE, OR
 10 THAT HASN'T HAD MAJOR RENOVATIONS OTHER THAN THROUGH DAMAGED
 11 AND EARTHQUAKE OR THINGS LIKE THAT, WE CONTINUE TO LOSE
 12 BERTHS DUE TO SHOALING, DISREPAIR AND BROKEN PILES. FOR US,
 13 AND I'LL TALK A LITTLE BIT MORE ABOUT IT IN THE NEXT SLIDE
 14 AROUND OUR FUNDING, THE LOSS OF BERTHS IS A LOSS OF REVENUE
 15 FOR MAINTENANCE AND OPERATIONS OF THE MARINA.
 16 WHAT CONTINUES TO HAPPEN IS THAT AS WE LOSE BERTHS AND
 17 AS WE LOSE ACCESSIBLE DOCKS, THERE IS A REDUCTION IN ACCESS
 18 TO RECREATIONAL BOATERS AND FEWER BERTHS. ONE OF THE THINGS
 19 WE WANT TO DO, THERE ARE A LOT OF REASONS WHY WE WANT TO DO
 20 THIS PROJECT, BUT ONE OF THE THINGS THAT CLEARLY NEEDS TO
 21 HAPPEN THERE IS WE NEED TO PROVIDE ACCESS TO PERSONS WITH
 22 DISABILITIES TO THE BUILDINGS AND THE FLOATING DOCKS. WE'RE
 23 TRYING TO MAKE SURE THAT EVERY SAN FRANCISCAN THAT WANTS TO
 24 PARTICIPATE IN THE AQUATIC RECREATIONAL OPPORTUNITIES THEY
 25 CAN ACTUALLY DO THAT AND THIS PROJECT ALLOWS US TO DO THAT.

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1 THERE ARE MANY OTHER REASONS, BUT I WANTED TO AT LEAST
 2 HIGHLIGHT THESE THINGS THAT ARE KEY REASONS AS TO WHY WE NEED
 3 TO RENOVATE THE MARINA.
 4 WHAT IS THE MARINA? THE MARINA IS A RECREATIONAL MARINA
 5 THAT, AS I SAID EARLIER, WAS CONVEYED TO THE SAN FRANCISCO
 6 REC AND PARK DEPARTMENT, TO THE CITY STARTING IN 1935 FOR THE
 7 WEST HARBOR, AND THEN I THINK IN 1962 FOR THE EAST HARBOR.
 8 THE MARINA EXISTS IN OUR BUDGET IN A SPECIAL FUND, AND
 9 THAT'S IMPORTANT BECAUSE IT IS NOT TIED TO THE GENERAL FUND
 10 IN ANY WAY. EVERYTHING THAT HAPPENS AT THE MARINA, THIS
 11 PROJECT AND THE MAINTENANCE AND OPERATIONS OF THE MARINA HAS
 12 TO BE FUNDED BY REALLY THREE MAJOR SOURCES OF REVENUE FOR THE
 13 MARINA, THE CONCESSIONS, THE BERTHS AND THE PERMITS THAT ARE
 14 LET OUT FOR USE OF DIFFERENT PARTS OF THE MARINA. THE
 15 REVENUES THAT ARE COLLECTED FROM THOSE THREE SOURCES FUND ALL
 16 OF OUR PROJECTS. AS I WAS TALKING TO ONE OF THE NEIGHBORS OR
 17 ONE OF THE FOLKS OUTSIDE, IT WAS A QUESTION AROUND WELL, DO
 18 WE SET ASIDE MONEY TO DO CAPITAL PROJECTS, BUT THE REALITY IS
 19 WE DON'T DO THAT PRETTY MUCH FOR ANYTHING, EVEN IN THE CITY
 20 FROM THE REVENUES THAT WE GET. WE GET BARELY ENOUGH TO
 21 ACTUALLY OPERATE AND MAINTAIN THE FACILITY, WHICH HAS SORT OF
 22 LED US TO WHERE WE ARE. AND THAT THE DEPARTMENT HASN'T HAD
 23 THE FUNDS TO GO OUT AND DO MAJOR RENOVATION PROJECTS AT THIS
 24 FACILITY. SO 40 YEARS LATER, WHAT DO WE DO? WE HAVE TO
 25 RENOVATE AND REPAIR IT IN ORDER TO KEEP IT A MARINA THAT

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1 PEOPLE CAN ACTUALLY USE.
2 SO AS WE STARTED TO LOOK AT THE RENOVATION PROJECT, WHAT
3 WE CURRENTLY HAVE AS FAR AS THE WAY TO FUND THIS THING IS
4 THROUGH A DEPARTMENT AND BOATING AND WATERWAYS LOAN. BEFORE I
5 EVEN GET INTO THAT ASPECT OF IT, WE'VE BEEN ASKED WHETHER
6 WE'VE LOOKED AT OTHER WAYS TO ACTUALLY FUND THIS PROJECT. AND
7 THE ANSWER TO THAT QUESTION IS YES. WE'VE ASKED THE MAYORS
8 OFFICE OF PUBLIC FINANCE TO LOOK AT OTHER FINANCING
9 MECHANISMS TO ACTUALLY FUND THE PROJECT. AND WHAT BECAME VERY
10 CLEAR TO US, BECAUSE OF THE EXTENT OF THE RENOVATION PROJECT
11 IS THAT THIS IS THE CHEAPEST WAY FOR THE CITY TO ACTUALLY
12 FUND THIS PROJECT AT THIS POINT. AND SO WE'VE GONE FORWARD
13 WITH THE BOATING AND WATERWAYS LOAN. WE ARE FORTUNATE THE
14 LOAN HAS BEEN APPROVED FOR US, DEFINITELY FOR THE WEST HARBOR
15 AND WE CONTINUE TO WORK WITH THE STATE DEPARTMENT, THE DAW
16 AROUND THE ISSUE OF THE EAST HARBOR.
17 SO HERE WE HAVE A LOAN THAT HAS TO BE REPAID. IT HAS TO
18 BE REPAID BY THE REVENUE THAT COMES FROM MAINLY THE BOATERS
19 THAT STORE THEIR BOATS THERE AND USE THE MARINA. AND RECENTLY
20 WE'VE HAD TO RAISE THE FEES FOR THOSE SO THAT WE CAN START TO
21 PREPARE FOR THAT. PART OF PREPARING FOR THAT IS THAT THE LOAN
22 ITSELF, ONE OF THE REQUIREMENTS IS THAT WE ACTUALLY KEEP A
23 1.25 DEBT TO EXPENDITURE RATIO GOING FORWARD IN ORDER TO PAY
24 THAT BACK. ALL OF THIS REALLY REQUIRES A LOT OF FUNDS AND A
25 LOT OF REVENUE FROM A VERY SMALL FACILITY REALLY WITHIN OUR

1 SYSTEM TO ACTUALLY ADDRESS JUST IT'S CAPITAL WORK, 40 YEARS
2 OF DEFERRED MAINTENANCE FOR SO LONG.
3 SO THAT IS THE PROJECT AND THAT IS WHY WE'RE HERE AND
4 THIS IS HOW WE ARE GOING TO BE PAYING FOR THIS PROJECT GOING
5 FORWARD. WHAT I WANTED TO DO QUICKLY NOW IS TO JUST START TO
6 ADDRESS SOME OF THE THINGS THAT CAME UP AT YOUR LAST MEETING
7 AND SOME OF THE THINGS THAT WE'VE HEARD OURSELVES, AND WE'VE
8 MET WITH SOME OF THE OTHER SOME OF THE NEIGHBORS AND SOME OF
9 THE CONCERNS. AND I'M GOING TO TRY AND NOTE THE THINGS THAT
10 WE FEEL ARE RELATED TO THE PROJECT AND THEREFORE ARE GOING TO
11 BE STUDIED AS PART OF THE EIR AND THEREFORE CAN BE
12 ACCOMMODATED AND WE'LL RESPOND. SOME THINGS WE BELIEVE ARE
13 OPERATIONS AND SHOULDN'T REALLY BE TIED TO THE PROJECT
14 ITSELF, THE EIR, IT'S NOT BEING DISCUSSED IN THE EIR EVEN
15 THOUGH THESE COMMENTS CAME UP AT YOUR LAST MEETING. THE FIRST
16 THING THAT'S BEEN DISCUSSED IS A RECENT ITEM THAT'S COME UP
17 IS THE A COMMERCIAL DOCK FEE THAT'S COME UP AND I THINK THAT
18 WAS DISCUSSED AT YOUR MEETING, THE FACT THAT THERE IS A NEW
19 COMMERCIAL DOCK FEE THAT'S BEEN APPROVED. THROUGH LEGISLATION
20 THAT WENT THROUGH THE BOARD FOR THAT FACILITY. THE NEIGHBORS
21 AROUND THE MARINA ARE VERY CONCERNED THAT THE DEPARTMENT IS
22 NOW MOVING TOWARDS HAVING HORN BLOWER YACHTS OR SOME OTHER
23 PRIVATE CONCERN, USE THE WEST HARBOR AS A PLACE TO DOCK AND
24 AS A PLACE TO HAVE PEOPLE COME AND PICK UP AND RUN THEIR
25 BUSINESS OUT OF THAT FACILITY. THE TRUTH OF THE MATTER IS

1 THAT IS NOT THE CASE. THE TRUTH OF THE MATTER IS WE CAN'T DO
 2 THAT PER THE STATUTE.
 3 AND SO WHAT WE'RE SAYING TO FOLKS AND HERE PUBLICLY SO
 4 PEOPLE CAN HEAR IT, IS WE WILL REVISE THE COMMERCIAL DOCK
 5 REGULATION THROUGH LEGISLATION LIMITING THAT COMMERCIAL USE
 6 OF THE WEST HARBOR TO NON-PROFITS OPERATING OPERATORS THAT
 7 ARE PROVIDING MARITIME AND RECREATIONAL EDUCATIONAL
 8 OPPORTUNITIES TO THE PUBLIC. THAT IS SOMETHING THAT'S BEEN
 9 GOING ON THERE FOR A WHILE AND THEREFORE THAT IS ALL THAT IS
 10 GOING TO COVER. WE DON'T HAVE, AS WE'VE HAD CONVERSATIONS
 11 WITH OTHERS AS WELL, THAT WE DON'T HAVE THAT SAME RESTRICTION
 12 ON THE EAST HARBOR, BUT DEFINITELY ON THE WEST HARBOR WE WILL
 13 MOVE TO MAKE THAT HAPPEN. THAT IS AN OPERATIONAL THING. IT IS
 14 NOT REALLY TIED TO THE PROJECT AS A WHOLE.

15 AND NOW THIS NEXT ITEM THAT WAS LISTED THAT WAS
 16 DISCUSSED WAS A FACT THAT PEOPLE BELIEVE THE PROJECT HAS NO
 17 PUBLIC BENEFIT. WE REALLY DISAGREE WITH THAT BECAUSE EVEN
 18 THOUGH THE BOATING AND WATERWAYS FUNDING IS REALLY FOR THE
 19 IMPROVEMENTS THAT ARE ON THE WATER, THE FLOATING DOCKS, ALL
 20 OF OUR BERTHS AND THE BREAK WATERS AND THOSE THINGS, THAT IS
 21 WHAT THE BOATING WATERWAYS DOLLARS ARE FOR. THEY ALSO FUND
 22 IMPROVEMENTS ON THE LAND SIDE THAT THEY BELIEVE IS DIRECTLY
 23 RELATED TO OPERATING THE MARINA AND THE WATER BASED
 24 CONSTRUCTION THAT THEY'RE FUNDING. AND SO THERE ARE A NUMBER
 25 OF LAND SITE IMPROVEMENTS THAT ARE TIED TO THIS THAT WE'VE

1 BEEN ABLE TO GET THEM TO TALK ABOUT PAYING FOR.
 2 THE PUBLIC REST ROOMS ARE GOING TO BECOME ALL ADA
 3 COMPLIANT. THERE IS A NEW PUBLIC ACCESS ALONG THE EXISTING
 4 BREAK WATER. THERE IS A NEW HAND LAUNCH THAT IS GOING TO
 5 ALLOW MORE PEOPLE SOMETHING THAT DOESN'T EXIST NOW TO BE ABLE
 6 TO ACTUALLY LAUNCH THEIR BOATS AND OTHER VESSELS AT THE
 7 MARINA.
 8 ONE OF THE THINGS THAT'S ALSO BEING DISCUSSED IS AROUND
 9 THE FACT THAT THERE IS A BAY TRAIL THAT RUNS THAT COMES OUT
 10 OF THE PRESIDIO AND IN ESSENCE JUST STOPS. AND WHAT WE'VE
 11 COMMITTED TO DO AND WE'VE ALREADY ACTUALLY ALREADY STARTED TO
 12 WORK WITH FORT MASON, IS TO GO TOGETHER AND TO GET A GRANT
 13 AND FIND OTHER SOURCES FOR THE MARINA GREEN IMPROVEMENTS TO
 14 THE BAY TRAIL. SO WE ARE MAKING THAT COMMITMENT AND WE ARE
 15 GOING TO GO FORWARD WITH THAT. WE HAVE ACTUALLY ALREADY
 16 ASSIGNED STAFF. THERE IS A GRANT DUE SHORTLY THIS MONTH AND
 17 WE ARE MOVING VERY QUICKLY TO TRY TO GET THAT IMPROVEMENT
 18 DONE WITH EITHER AS PART OF THIS PROJECT OR MAYBE EVEN BEFORE
 19 THEN.

20 SO, THE NEXT ITEM HAS TO DO WITH THE ISSUE OF
 21 SIGNIFICANT HARBOR AND DOCK EXPANSIONS. AND I THINK THERE ARE
 22 SOME NUMBERS THAT MIGHT HAVE BEEN STATED AROUND THE MANY
 23 THOUSANDS OF SQUARE FOOT OR 11 FOOTBALL FIELDS OF ADDITIONAL
 24 DOCKS THAT ARE BEING ADDED. THE REALITY IS WE DON'T BELIEVE
 25 THAT'S THE CASE. THE PLAN THAT WE ARE PRESENTING, WE BELIEVE,

1 IS REALLY FOR THE WEST HARBOR RESULTS AND REGAINING BERTHS
 2 THAT HAVE BEEN LOST FOR YEARS, SINCE THE 60S. AND I'M GOING
 3 TO TRY AND SHOW YOU AN OVERLAY THAT I THINK WILL TRY TO
 4 DEMONSTRATE THAT. AND IN THE EAST HARBOR PLAN IT IS BASICALLY
 5 UNCHANGED FROM THE CURRENT CONFIGURATION. THERE ARE A FEW NEW
 6 BERTHS THAT ARE GOING IN AND HOPEFULLY THIS WILL WORK HERE.
 7 SO IF YOU REMEMBER THE PICTURE I PUT UP EARLIER, HAD THE EAST
 8 HARBOR HERE AND THE WEST HARBOR.

9 THIS IS THE HARBOR, IN ESSENCE, WE BELIEVE IT IS AS IT
 10 EXISTED IN THE 60S. WHEN YOU TAKE WHAT WE ARE PROPOSING TO
 11 DO, AND OVERLAY HERE... IT IS SMALL, SO I APOLOGIZE FOR
 12 THAT. OTHER THAN AREAS LIKE HERE WHERE THE BERTHS ARE
 13 ACTUALLY BEING REALIGNED, YOU'LL NOTICE THAT THE BERTHS, IN
 14 ESSENCE, MATCH UP. THERE ARE A FEW ADDITIONAL BERTHS IN THIS
 15 AREA, THERE IS AN EXTENSION OF SOME OF THE BERTHS HERE, AND
 16 THERE ARE BERTHS THAT ARE NOT BEING REPLACED HERE, THAT WE
 17 ARE LOSING IN THE EAST HARBOR. BUT REALLY WHAT PEOPLE WHAT WE
 18 DON'T, WHAT IS OUT THERE NOW IS NOT THE WAY THE PLACE LOOKED
 19 IN 1962. AND SO WHEN YOU PUT 1962 TO WHAT OUR PLANS SHOW, IT
 20 LOOKS MUCH MORE LIKE WHAT'S JUST TRYING TO RETURN THE HARBOR
 21 TO WHAT IT USED TO BE.

22 OKAY. IT'S NOT EXACT. I WANT TO MAKE SURE THAT PEOPLE
 23 THAT ARE GOING TO COME UP AND MAKE PUBLIC COMMENT DON'T THINK
 24 THAT I'M SAYING IT IS AN EXACT REPLIC OF WHAT WAS THERE IN
 25 1962. I'M JUST SAYING THAT IT'S NOT THIS GREAT EXPANSION OF

1 THE HARBOR.

2 THE NEXT ITEM ON THE PUBLIC COMMENT HAS TO DO WITH THE
 3 LOSS OF OPEN SPACE AND PUBLIC VIEWS. AND THIS IS TRULY ONE OF
 4 THOSE THINGS THAT HAS TO -- THAT AS WE BRING A PROJECT
 5 FORWARD, WE LOOK AT AGAIN, THIS IS 40 YEARS BEFORE THE LAST
 6 TIME WE DID ANYTHING HERE. AND WHAT WE'VE PRESENTED HERE IS
 7 SORT OF THE WORST CASE SCENARIO.

8 WE'VE LOOKED AT OUR MARINA. WE'VE MADE DECISIONS ABOUT
 9 WHAT ARE THE BEST WAYS-- WHAT IS THE BEST WAY TO RUN A MODERN
 10 MARINA AND WHAT ARE THE FACILITIES THAT ARE NECESSARY TO RUN
 11 THAT MARINA. AND WE'VE PROPOSED THEM AS FEATURES IN THIS
 12 PROJECT SO THAT THEY CAN BE STUDIED, AND SO THAT WE CAN FIND
 13 OUT WHAT THEIR IMPACTS ARE AND RESPOND BASED ON WHAT THE EIR
 14 SAYS.

15 SO THE FIRST THING IS A MAINTENANCE BUILDING. PEOPLE
 16 WILL TELL YOU THAT, YES, RIGHT NOW, THERE IS A P.U.C.
 17 BUILDING THAT CURRENTLY EXISTS AT THE MARINA. AND WE HAVE
 18 SOME SPACES IN THERE THAT WE'RE USING FOR MAINTENANCE. IT IS
 19 NOT ADEQUATE. AND WHAT WE WILL BE DOING, OUR FIRST OPTION IS
 20 TO NEGOTIATE WITH THE P.U.C. TO GET PERMANENT SPACE IN THAT
 21 BUILDING TO CONTINUE TO RUN OUR MARINA. IF THAT DOESN'T
 22 HAPPEN, WE NEED TO PROVIDE AT LEAST AN OPTION THAT GETS
 23 STUDIED IN THE EIR. AND THAT'S WHAT THIS DOES. SO, THAT'S
 24 WHAT WE'VE DONE THERE.

25 SAME THING WITH THE BATHROOM EXPANSION. THE FACILITIES

1 ARE REQUIRED IN ORDER TO OPERATE A MODERN MARINA. AND SO
 2 WE'VE PROPOSED LOCATIONS FOR THE BATHROOMS AND WE'RE LOOKING
 3 FOR THE EIR TO TELL US WHAT THEIR IMPACTS ARE AND WE'LL
 4 RESPOND ACCORDINGLY.
 5 ANOTHER POINT OF CONTENTION IS A PROPOSAL OF A NEW
 6 HARBOR OFFICE WHICH EXISTS IN AN EXISTING BUILDING. IT'S TOO
 7 SMALL, NOT ADA ACCESSIBLE.
 8 WE ARE PROPOSING TO PUT IN A DEGAUSSING STATION. THE
 9 LOCATION OF THE DEGAUSSING STATION OUT THERE NOW OFFERS
 10 BETTER MANAGEMENT OF THE ENTIRE MARINA. IT IS MORE CENTRAL,
 11 WE CAN SEE THE ACTIVITY THAT IS GOING ON, OUR MARINA STAFF
 12 CAN ACTUALLY RESPOND FASTER TO THE NEEDS OF THE USERS AT THE
 13 MARINA AND CAN ACTUALLY ALSO TRACK THE ACTIVITIES THAT ARE
 14 GOING ON THE GREEN ITSELF. SO WE FELT IT WAS A MUCH BETTER
 15 PLACE.
 16 THE EIR TALKS ABOUT THE FACT THAT IT'S AN HISTORIC
 17 FACILITY, AND THEREFORE THE EIR WILL TELL US WHAT WE CAN OR
 18 CAN'T DO AND HOW MUCH OF THE RENOVATION WE CAN DO WITHIN THAT
 19 BUILDING. THERE HAS BEEN SOME DISCUSSION AROUND THE FACT THAT
 20 THE DEGAUSSING STATION WAS SUPPOSED TO BE DEMOLISHED AND I
 21 THINK WHEN IT WAS WITH THE NAVY OR WITH THE ARMED FORCES,
 22 THERE WAS SOME DISCUSSION AROUND THAT. BUT THE REC AND PARK
 23 DEPARTMENT IS NOT CONTEMPLATED IN THE PAST TO DEMOLISH THIS
 24 PARTICULAR BUILDING. AGAIN, IT JUST NEEDS TO BE STUDIED.
 25 THEN THERE IS THE ISSUE OF THE REDUCTION IN PUBLIC

1 ACCESS. THE DEPARTMENT ACTUALLY BELIEVES THAT THE PROJECT
 2 WILL ENHANCE PUBLIC ACCESS TO THE WATERFRONT. THERE IS GOING
 3 TO BE NEW ACCESS TO THE EAST BREAK WATER THAT DOESN'T EXIST
 4 TODAY THAT WILL INCREASE ACCESS TO THE EAST BREAK WATER. ALL
 5 THE ADA IMPROVEMENTS THAT I DISCUSSED TO THE BUILDINGS AND
 6 THE DOCKS AND THE HAND LAUNCH, SOMETHING THAT IS GOING TO BE
 7 NEW, THAT ALLOWS FOR SMALL BOATS, KAYAKS ALLOWS ACCESS TO THE
 8 WATER. RIGHT NOW THERE IS NO WAY FOR PEOPLE TO GO TO THE
 9 MARINA WHO JUST WANT TO SHOW UP WITH THEIR KAYAK ON THE BACK
 10 OF THEIR XTERRA AND PUT IT IN THE WATER. THIS ALLOWS THAT TO
 11 HAPPEN. SO WE TRULY BELIEVE WE ARE GOING TO BE INCREASING
 12 PUBLIC ACCESS TO THE MARINA.
 13 AND THEN, OF COURSE, THERE IS THE ISSUE OF THE NEW BREAK
 14 WATERS. ALL OF THE DESIGNERS AND THE BOATING AND WATERWAYS
 15 WHO HAVE REVIEWED OUR PROJECT, BELIEVE THAT THE BREAK WATERS
 16 ARE A RECOMMENDED DESIGN FEATURE TO PROVIDE THE CITIES AND
 17 THE STATES INVESTMENT FROM SIGNIFICANT STORM DAMAGE. WE'VE
 18 HAD STORM DAMAGE IN THE PAST FROM HIGH SURF AND HIGH SURGE.
 19 IF WE'RE GOING TO BE PUTTING 40 MILLION INTO A FACILITY, WE
 20 WANT IT TO LAST 30, 40 YEARS AND THIS IS PART OF PROTECTING
 21 THAT ASSET. SO, THE BOATING WATERWAYS, IN ORDER TO GRANT US
 22 THE LOAN, THEY'VE REVIEWED THE PROJECT, REVIEWED EVERYTHING
 23 THAT'S IN IT, AND FEEL CONFIDENT TO GIVE US THIS LOAN IN
 24 ORDER TO BUILD IT AS WE HAVE DESIGNED IT THUS FAR.
 25 SO THE LAST THING THAT I'M ACTUALLY GOING TO HAND OVER

1 TO MR. ROLLO HAS TO DO WITH THE SEISMIC UPGRADE OF THE
 2 HISTORIC SEAWALLS, I SHOULD SAY. WE'VE HAD COMMENTS THAT AS
 3 PART OF THIS PROJECT THAT WE SHOULD ACTUALLY BE SEISMICALLY
 4 UPGRADING THE HISTORIC SEAWALLS BECAUSE OF CONCERNS THAT
 5 PEOPLE HAVE REGARDING LIQUEFACTION IN THE MARINA ITSELF.
 6 SO ID LIKE TO BRING UP MR. ROLLO RIGHT NOW TO TALK TO
 7 YOU ABOUT WHAT THAT REALLY MEANS AND THE STUDIES THAT HE'S
 8 DONE IN THE PAST, OKAY.

9 **FRANK ROLLO:** GOOD EVENING. MADAM PRESIDENT, MEMBERS OF
 10 THE COMMISSION, MY NAME IS FRANK ROLLO, R-O-L-L-O.
 11 I WOULD LIKE TO TAKE A FEW MINUTES AND DISCUSS THE
 12 SETTING AND DISCUSS WHAT I BELIEVE THE RESULTS OF SUBSERVICE
 13 INVESTIGATION AND ANALYSIS HAVE INDICATED HOW THE MARINA WILL
 14 BEHAVE, SPECIFICALLY IN THE AREA OF THE MARINA SEAWALL. WITH
 15 YOUR PERMISSION, I WOULD LIKE TO -- CAN SOMEONE ASSIST ME
 16 WITH THIS A LITTLE BIT? THEY'RE DOING IT. THANK YOU VERY
 17 MUCH.

18 WHAT I PUT ON HERE IS A PLAN THAT DEPICTS THE HISTORY OF
 19 THE FILLING OF THE MARINA DISTRICT. BASICALLY WHAT WE HAVE IS
 20 AN AREA THAT WAS UNDER WATER TO ABOUT A LINE RIGHT THROUGH
 21 HERE. THIS IS WHAT'S CALLED STRAWBERRY ISLAND. THIS WAS
 22 PREEXISTING. THIS AREA WAS CALLED WASHER WOMAN'S COVE.
 23 STARTING IN ABOUT 1851 AND ENDING IN ABOUT 1911, FILL WAS
 24 PLACED -- THE FIRST THING THAT WAS DONE WAS A MR. FAIR BUILT
 25 A RAILROAD TRESTLE AND CONSTRUCTED WHAT IS KNOWN AS THE

1 FAIR'S SEAWALL. AFTER THE SEAWALL WAS BUILT, FILL WAS PLACED.
 2 IN 1911 THE CITY OF SAN FRANCISCO REALIZED THIS WOULD
 3 BE AN IDEAL LOCATION FOR THE GOLDEN GATE EXPOSITION. SO THEY
 4 HYDRAULICALLY PLACED FILL. SOIL HAS BEEN TRANSPORTED BY WATER
 5 AND THEN PLACED UNDER WATER. THIS LARGE GRAY AREA THAT YOU
 6 SEE IS THE HYDRAULIC FILL AND THEN THE GRAY AREA THAT YOU SEE
 7 HERE IS HYDRAULIC FILL. IN 1930, RESIDENTIAL DEVELOPMENT
 8 BEGAN TO OCCUR. AFTER THE FAIR'S SEAWALL WAS BUILT, THE
 9 MARINA BOULEVARD SEAWALL WAS CONSTRUCTED.
 10 THE FAIR'S SEAWALL CONSISTS OF A LARGE DIKE OF SAND,
 11 GRAVEL AND ROCKS. THE SAND, GRAVEL AND ROCKS WERE BROUGHT IN
 12 BY RAILROAD TO THIS LOCATION. THE MARINA SEAWALL CONSISTS OF
 13 A CONCRETE WALL WITH BASALT FACING, THAT IS SUPPORTED ON
 14 PILES OF CONCRETE, COMPOSITE CONCRETE AND WOOD. IN 19-- SO
 15 UNDERSTAND, THAT MOST OF THIS AREA WAS UNDER WATER IN 1906.
 16 SO THERE WAS VERY LITTLE HISTORY OF IT'S PERFORMANCE DURING
 17 THE 1906 EARTHQUAKE.

18 IN 1989 THERE WAS A SIGNIFICANT EVIDENCE OF LIQUEFACTION
 19 AND SOME LATERAL SPREADING. LIQUEFACTION IS A PHENOMENA THAT
 20 OCCURS IN LOOSE SANDS THAT WERE PLACED UNDER WATER WHERE THE
 21 GRAINS OF SAND ARE FORCED TO PART BY THE FORCE OF THE
 22 EARTHQUAKE, CREATING WHAT'S CALLED QUICK SAND. IF THAT SAND
 23 EXISTS ON SLOPING GROUND AND IF THE EARTHQUAKE IS STRONG
 24 ENOUGH AND LASTS LONG ENOUGH, THAT SAND WILL FLOW Laterally
 25 TO WHAT'S CALLED AN UNCONFINED SURFACE, SUCH AS THE BAY.

1 AND WE SAW DURING THE LOMA PRIETA EARTHQUAKE SIGNIFICANT
 2 EVIDENCE OF LIQUEFACTION IN THE HYDRAULIC FILL, AND LATERAL
 3 MOVEMENT OF THIS FILL ON THE ORDER OF FOUR TO SEVEN INCHES.
 4 AFTER THE EARTHQUAKE, THE CITY AND COUNTY OF SAN FRANCISCO --
 5 AFTER THE LOMA PRIETA EARTHQUAKE, CITY AND COUNTY OF SAN
 6 FRANCISCO COMMISSIONED A STUDY AND I WAS PART OF WHAT WAS
 7 CALLED A BLUE RIBBON PANEL TO EVALUATE THIS PERFORMANCE. AND
 8 THE STUDY CONCLUDED THAT DURING A 1906 TYPE EARTHQUAKE, UP TO
 9 ONE FOOT OF VERTICAL SETTLEMENT WOULD OCCUR WITHIN THE MARINA
 10 AND UP TO THREE FEET OF HORIZONTAL MOVEMENT WOULD OCCUR IN
 11 THE MARINA.

12 THE STUDY ALSO CONCLUDED THAT THE MARINA SEAWALL WAS
 13 POTENTIALLY VULNERABLE TO OVER TURNING WHEN THESE FORCES FROM
 14 THE EARTHQUAKE ACTED ON THE WALL. THAT IS THE WALL WOULD
 15 BASICALLY TIP OVER.

16 AFTER THAT STUDY WAS COMPLETED, THE BOARD OF SUPERVISORS
 17 REQUESTED THE DIRECTOR OF PUBLIC WORKS, AT THE TIME DICK
 18 EVANS AND JOHN CLIFFS, TO PUT TOGETHER A GROUP TO STUDY HOW
 19 THE MARINA SEAWALL COULD BE REINFORCED TO RESIST EARTHQUAKES.
 20 VARIOUS MEMBERS WERE SELECTED, AND I WAS FORTUNATE ENOUGH TO
 21 SERVE ON THAT, AS WELL AS REPRESENTATIVES FROM THE MARINA
 22 DISTRICT, JOAN GIRARDOT, I APOLOGIZE IF I'M SAYING THE LAST
 23 NAME WRONG, MR. JACK CROWLEY, AND MR. BOB SAVARI (PHONETIC).
 24 WE MET SEVERAL TIMES AND CONCLUDED THAT, YES, WE COULD
 25 STRENGTHEN THE MARINA SEAWALL BY ADDING SOME MORE PILES.

1 IN 1997, THE CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT
 2 OF PUBLIC WORKS SAID, OKAY, IF THAT'S THE CASE LETS GET IN
 3 HERE AND STUDY THIS MARINA SEAWALL TO SEE WHAT REALLY HAS TO
 4 BE DONE.

5 WE WERE SELECTED TO DO THE STUDY. WE RELIED HEAVILY ON
 6 THE INFORMATION THAT WAS DEVELOPED BY THE 1991 STUDY AS WELL
 7 AS WE DRILLED SIGNIFICANT NUMBER OF BORINGS TO BETTER
 8 EVALUATE SUBSURFACE CONDITIONS. AND WE CONCLUDED THAT, YES,
 9 WE HAVE TWO ISSUES. WE HAVE AN AREA WIDE ISSUE AND A LOCAL
 10 STABILITY ISSUE.

11 WE CONCLUDED THAT DURING A 1906 TYPE EARTHQUAKE, THERE
 12 WOULD, IN FACT, BE THREE FEET OF HORIZONTAL MOVEMENT OF THE
 13 SEAWALL AND THE LANDS BEHIND THE SEAWALL. THERE WOULD, IN
 14 FACT, BE LIQUEFACTION RESULTING IN LIQUEFACTION INDUCED
 15 SETTLEMENT OF UP TO 12 INCHES IN THIS HYDRAULIC FILL. SO
 16 HOMES THAT SIT ON THAT MATERIAL ARE AT RISK OF MOVING
 17 LATERALLY AND SETTLING VERTICALLY.

18 WE CONCLUDED THAT ONE OF THE IMPROVEMENTS THAT WOULD
 19 HELP THAT IS HELPING TO REDUCE THE MOVEMENT IS THE BOG SEWER*
 20 THAT WAS BUILT BY THE CITY AND COUNTY OF SAN FRANCISCO, AND
 21 THAT IS THIS DOTTED LINE. AND THE REASON IT HELPS IS BECAUSE
 22 IT HAS BENEATH IT A LAYER OF GRAVEL, AND THAT GRAVEL WOULD
 23 TEND TO ABSORB THE FORCE THAT THE EARTHQUAKE WOULD INDUCE IN
 24 THE WATER AND WOULD TEND TO REDUCE THE MOVEMENTS.

25 SO, THIS BOG SEWER IS PROVIDING SOME RESISTANCE TO THE

1 DAMAGING EFFECTS OF LIQUEFACTION AND LATERAL SPREADING ON AN
 2 AREA WIDE BASIS.
 3 WE ALSO FOUND THAT, YES, WE COULD STRENGTHEN THE MARINA
 4 SEAWALL, AND YES, WE CAN IMPROVE THE SOIL BETWEEN THE MARINA
 5 SEAWALL AND THE BOG SEWER. BUT DOING THAT WOULD HAVE NO
 6 EFFECT ON THE BEHAVIOR OF THESE GRAY SOILS OR THIS HYDRAULIC
 7 FILL THAT IS IN THE MARINA, AND TO THE SOUTH OF THE BOG
 8 SEWER. CONSEQUENTLY, WHILE WE COULD IMPROVE THE SEAWALL, THE
 9 POTENTIAL STILL EXISTS THAT DAMAGE, IF NOT FAILURE OF THE
 10 SEAWALL, WOULD OCCUR. FURTHERMORE, IMPROVING THE SEAWALL DOES
 11 NOTHING TO IMPROVE THE STABILITY, LIQUEFACTION POTENTIAL, OR
 12 LATERAL SPREADING WITHIN THE GREATER MARINA DISTRICT. I'D BE
 13 PLEASED TO ANSWER ANY QUESTIONS. I APOLOGIZE IF I CONFUSED
 14 YOU. I'M TRYING TO KEEP IT AS BASIC AS I CAN.
 15 **YOMI AGUNBIADE:** OKAY, THANK YOU, MR. ROLLO. THAT IS
 16 ONE OF THE THINGS THAT IS IMPORTANT TO GET OUT OF THIS. SINCE
 17 I'VE BEEN WITH THE DEPARTMENT AND WE'VE HAD ALL THE MEETINGS
 18 WITH ALL THE ENGINEERS, BASICALLY THAT IS THE RESULT OF ALL
 19 OF THE WORK THAT'S BEEN DONE THUS FAR, THAT THE CONCERNS THAT
 20 WE'VE HEARD WHICH HAS TO DO WITH LIQUEFACTION, WHICH HAS TO
 21 DO WITH LIQUEFACTION IN THE GRAY AREA THAT WAS PRESENTED
 22 THERE, REALLY CAN'T BE ADDRESSED BY ANYTHING THAT WE WOULD DO
 23 ON THIS PROJECT OR ANY OTHER PROJECT THAT THE CITY WOULD TAKE
 24 ON BASED ON THE ENGINEERING STUDIES THAT HAVE BEEN DONE.
 25 SO, IN CLOSING, FOR ME ONE OF THE THINGS I WANT US TO

1 REMEMBER HERE IS THAT AS I SAID EARLIER, IS THAT IN 1935 AND
 2 LATER IN 1962, THE STATE STATUTE CONVEYED THE WEST HARBOR AND
 3 THEN IN 1962, THE EAST HARBOR TO THE CITY AND PORTIONS OF IT
 4 SAY THAT ALL OF THE ABOVE DESCRIBE REAL PROPERTY REFERRING TO
 5 THE MARINA AS A WHOLE, HERE BY GRANTED SHALL BE FOREVER HELD
 6 BY THE CITY AND COUNTY OF SAN FRANCISCO AND BY ITS SUCCESSORS
 7 AND TRUSTS FOR USES AND PURPOSES AND UPON THE EXPRESS
 8 CONDITIONS FOLLOWING, TO WIT, SAID REAL PROPERTY SHALL BE
 9 USED SOLELY FOR AQUATIC RECREATIONAL, BOULEVARD PARK AND
 10 PLAYGROUND PURPOSES. ULTIMATELY, IT IS THE CITY'S
 11 RESPONSIBILITY TO ADDRESS THESE ISSUES. IN ESSENCE, BY
 12 STATUTE. THE STATE GAVE US THIS LAND IN TRUST TO MAINTAIN IT,
 13 TO KEEP IT, AND THIS IS PART OF OUR RESPONSIBILITY. AND
 14 WHAT WE'RE TRYING TO DO HERE IS TO PRESENT OUR BEST DESIGNS
 15 FOR ADDRESSING THAT AND DEALING WITH THE CITY'S
 16 RESPONSIBILITY AND WE ARE JUST REALLY LOOKING FOR THE
 17 PLANNING DEPARTMENT AND ALL OF OUR CONSULTANTS TO EVALUATE
 18 THE EIR HERE BACK FROM THE COMMUNITY. AND AT LEAST GET AN EIR
 19 THAT IS APPROVED THAT STATES ALL OF THE MITIGATIONS THAT WE
 20 NEED TO DO AND ALL OF THE IMPACTS THAT ARE OUT THERE SO WE
 21 CAN FINALLY DEFINE THIS PROJECT AND MOVE FORWARD. MANY PEOPLE
 22 IN THE ROOM WILL TELL YOU THAT THIS PROJECT HAS BEEN TALKED
 23 ABOUT AND TALKED ABOUT PROBABLY FOR 16 OR 17 YEARS. IT'S TIME
 24 FOR US TO SORT OF GET TO THE NEXT PHASE, AT LEAST GET AN EIR
 25 ON OUR HANDS. SO I THANK YOU FOR YOUR TIME AND WE CAN ANSWER

1 ANY QUESTIONS THAT YOU HAVE.

2 **COMMISSIONER ALEXANDER:** THANK YOU. WE HAVE A
3 REPRESENTATIVE FROM SUPERVISOR ALIOTO-PIER'S OFFICE WHO
4 WANTED TO MAKE A STATEMENT.

5 **ROB BLACK:** GOOD EVENING, COMMISSIONERS, ROB BLACK FROM
6 SUPERVISOR ALIOTO-PIER'S OFFICE. SHE ASKED ME TO READ A BRIEF
7 STATEMENT.

8 SAN FRANCISCO'S MARITIME HISTORY IS A PROBLEM. FOR
9 GENERATIONS WE HAVE SERVED AS THE GATEWAY TO THE PACIFIC
10 OCEAN. A BIG PART THAT OF PROUD TRADITION IS THE MARINA YACHT
11 HARBOR. THE YACHT HARBOR SERVES AS A HOST FOR DOZENS OF
12 REGATTAS EVERY YEAR. INCLUDING THE ST FRANCIS ANNUAL OLYMPIC
13 BOAT SERIES. THE YACHT HARBOR HAS BEEN PART OF THE U.S.

14 OLYMPICS TRIALS AS WELL AS VARIOUS NATIONAL AND WORLD SAILING
15 CHAMPIONSHIPS. THROUGH THE ST FRANCIS AND GOLDEN GATE YACHT
16 CLUBS, YOUNG SAN FRANCISCANS LEARN TO SAIL AND GET THE
17 OPPORTUNITY TO COMPETE ALL OVER THE WORLD. WE ARE FORTUNATE
18 TO HAVE SUCH A WONDERFUL PUBLIC SAILING RESOURCE IN THE BAY
19 AREA. UNFORTUNATELY, THE MARINA YACHT HARBOR IS NOT THE JEWEL
20 IT ONCE WAS. THE CURRENT WOOD HARBOR WAS BUILT IN 1963. MANY
21 OF ITS PILLINGS AND UTILITY INFRASTRUCTURE HAVE DEGRADED AND
22 BECOME OBSOLETE.

23 IN FACT, SECTIONS OF THE HARBOR CAN NO LONGER SUPPORT
24 BOATS. BECAUSE THE WOOD PILLINGS AND DOCKS HAVE LITERALLY
25 FALLEN APART DUE TO EXPOSURE TO THE ELEMENTS. FOR OVER A

1 DECADE THE REC AND PARK DEPARTMENT HAS PUT FORWARD VARIOUS
2 PLANS TO RENOVATE THE HARBOR.

3 FINALLY, IN 2003 THE BOARD OF SUPERVISORS APPROVED A
4 FEASIBILITY STUDY FOR THE RENOVATION AND THE CITY WAS ABLE TO
5 SECURE THE FUNDING. AFTER ALL THESE YEARS WE ARE FINALLY
6 GETTING CLOSE. HOPEFULLY SOON WE WILL BE ABLE TO RESTORE THE
7 SHINE OF WHAT ONCE WAS THE JEWEL OF THE GOLDEN GATE. I LOOK
8 FORWARD TO WORKING WITH YOU, THE YACHT HARBOR BOATERS AND THE
9 MARINA NEIGHBORS IN DEVELOPING THE FINAL DESIGN AND
10 CONSTRUCTING A HARBOR THAT MAKES US ALL PROUD. THANK YOU VERY
11 MUCH FOR YOUR TIME.

12 **COMMISSIONER ALEXANDER:** THANK YOU. WE'LL NOW OPEN IT UP
13 FOR PUBLIC COMMENT. AND I HAVE SPEAKER CARDS. JOAN GIRARDOT
14 FOLLOWED BY RENE MONSHART (PHONETIC).

15 **JOAN GIRARDOT:** MR. ALEXANDER, THE CHAIR SUE LEE CALLED
16 ME TODAY AND TOLD ME THAT SHE WANTED ME TO HAVE EIGHT MINUTES
17 TO RESPOND. AND SHE'S NOT HERE NOW.

18 **COMMISSIONER ALEXANDER:** I DON'T KNOW ANYTHING ABOUT
19 THAT. SO LETS START OUT WITH THREE. IF NECESSARY, WE'LL HAVE
20 YOU COME BACK.

21 **JOAN GIRARDOT:** I THINK THE REASON THAT SHE WANTED ME
22 TO DO THAT IS BECAUSE I WROTE THE APPEAL OF THE NEGATIVE
23 DECLARATION ON BEHALF OF THE NEIGHBORS AND WE HAVE MANY, MANY
24 THINGS TO SAY.

25 **COMMISSIONER ALEXANDER:** OKAY. I WILL GIVE YOU FIVE.

1 WE'LL SPLIT THE DIFFERENCE.

2 **JOAN GIRARDOT:** GOOD EVENING. ALL RIGHT. I'LL HAVE TO

3 TRY TO REARRANGE WHAT I WAS GOING TO SAY. I SUPPOSE THE POINT

4 NUMBER ONE IS THAT - AND I FEEL THAT THIS IS A LEGAL POINT.

5 THE BOARD OF SUPERVISORS BY RESOLUTION 450-94, PASSED A

6 RESOLUTION WHICH IS STILL CITY POLICY, WHICH SAYS, WITHOUT

7 THE BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN

8 FRANCISCO URGES THE MAYOR TO OPPOSE THE CONSTRUCTION OF ANY

9 ADDITIONAL BREAKWATER IN THE OUTER WEST HARBOR. SO WHY HAS

10 STAFF DESIGNED BREAKWATERS FOR THE OUTER WEST HARBOR? THAT IS

11 STILL CITY POLICY.

12 MY SECOND COMMENT IS THAT WHILE I WOULD ASK THE

13 COMMISSION TO TAKE THREE ACTIONS TONIGHT, ONE OF THOSE

14 ACTIONS IS TO NOT ALLOW THIS DRAFT EIR TO PROCEED TO THE FEIR

15 STAGE UNTIL FINAL DESIGN FOR ALL THE COMPONENTS IS COMPLETE.

16 NOW, IF A PRIVATE DEVELOPER CAME HERE AND TOLD YOU THAT HE

17 MAY PUT HIS HIGH-RISE IN THIS LOCATION ON THE PROJECT SITE,

18 OR HE MIGHT NOT PUT IT IN THAT LOCATION, OR HE MAY HAVE THE

19 EXTERIOR ELEVATIONS OR HE MAY NOT, YOU WOULD NOT HAVE

20 CALENDARED HIS ITEM. AND YET WE DO NOT HAVE EXACT PLACEMENTS

21 OF THESE BREAKWATERS IN THE OUTER WEST HARBOR.

22 NOW WHY IS THAT PARTICULAR ISSUE IMPORTANT? BECAUSE

23 THERE IS A COMBINED SEWER OUTFLOW THERE. IF YOU HAD THE

24 VERTICAL BREAKWATER TO THE WEST OF THE COMBINED SEWER

25 OUTFLOW, YOU WOULD HAVE DIFFERENT WATER QUALITY IMPACTS THAN

2.4

7.1

1 IF YOU PUT IT TO THE EAST. SO WITHOUT AN EXACT PLACEMENT IN

2 THE FINAL DESIGN OR THE PROJECT COMPONENTS, HOW CAN YOU NOT

3 HOLD THE CITY AGENCY TO THE SAME STANDARD THAT YOU WOULD HOLD

4 A PRIVATE DEVELOPER?

5 SO I ASK YOU TO MANDATE THE FINAL DESIGN BE DONE BEFORE

6 WE GO INTO THE FEIR STAGE AND THAT YOU EXTEND THE PUBLIC

7 COMMENT TO BE ABLE TO COMMENT ON THAT FINAL DESIGN. I

8 UNDERSTAND THAT THE DEPARTMENT WOULD NOT LIKE TO DO THIS

9 BECAUSE OF COST, BUT WHAT ARE WE APPROVING THEN? IF YOU DON'T

10 HAVE THE FINAL DESIGN HOW CAN YOU APPROVE AN ENVIRONMENTAL

11 IMPACT REPORT ON A CONCEPT?

12 MY NEXT POINT IS, AND WE HAVE BROUGHT THIS UP BEFORE, I

13 PERSONALLY ORGANIZED 11 NEIGHBORHOOD MEETINGS IN THE LAST TWO

14 YEARS, AND EVERY GROUP OF NEIGHBORS HAS AGREED THAT WE WOULD

15 LIKE YOU TO REQUIRE THAT STAFF EVALUATE WHAT WE ARE CALLING A

16 REPAIR AND REPLACE ALTERNATIVE. IT'S LESS ENVIRONMENTALLY -

17 IT'S MORE ENVIRONMENTALLY SENSITIVE, LESS ENVIRONMENTALLY

18 DAMAGING. I PASSED THIS OUT TO YOU AT THE OCTOBER 6TH

19 HEARING. AND IT'S PERFECTLY REASONABLE, AND I BELIEVE THAT

20 CEQA DEMANDS THAT ALL REASONABLE ALTERNATIVES BE EVALUATED.

21 AND WHAT THAT REPAIR AND REPLACE ALTERNATIVE MEANS IS, YOU

22 KNOW, IF YOU HAVE THE RETAINING THE EXISTING LAYOUT WITH THE

23 EXISTING BERTH SIZE DISTRIBUTIONS AND REPAIR AND MAKE

24 REPLACEMENTS AS NECESSARY, SO THAT IF YOU HAVE 300 OUT OF THE

25 700 PILES THAT NEED REPLACING, REPLACE THEM. DON'T REPLACE

7.1
cont

10.1

1 ALL 700.

2 THE RATIONALE OF THE DEPARTMENT FOR THIS WHOLE TEARING

3 EVERYTHING OUT AND REPLACING IT AND DRIVING THIS COST TO 40

4 MILLION IS BECAUSE THEY WANT TO DELETE THE BERTHS FOR SMALL

5 BOATS, AND THEY WANT TO CREATE THE ROOM FOR THE LARGE BOATS.

6 AND WE LIKE THE EXISTING BERTH SIZE DISTRIBUTION AND WE LIKE

7 - IT IS NOT A QUESTION OF LIKE. WE THINK THAT REC AND PARKS

8 MISSION IS TO MAKE THEIR FACILITIES AVAILABLE TO THE BROADEST

9 RANGE OF THE PUBLIC, AND THAT MEANS THE GUY WHO CAN ONLY

10 AFFORD A 20 FOOT SAILBOAT AS WELL AS THE GUY WHO CAN AFFORD A

11 60 FOOT MOTORIZED YACHT. AND SO WE WOULD ASK YOU TO REQUIRE

12 STAFF TO INCLUDE THAT ALTERNATIVE IN THE FINAL EIR.

13 NOW AS FAR AS THE COMMENT FROM MR. AGUNBIADE THAT THIS

14 IS NOT AN EXPANSION, ANYONE WANTS TO SIT DOWN WITH ME I CAN

15 SHOW YOU THAT IT IS AN EXPANSION BY SHOWING YOU THE SITE

16 LAYOUT PLANS FROM 1997, WHICH WERE CERTIFIED BY DEPARTMENT OF

17 PUBLIC WORKS WHICH I HAVE IN MY POSSESSION HERE, AND YOU

18 COUNT THE BERTH SIZES, YOU COUNT THE DISTRIBUTION, AND YOU

19 COMPARE IT TO THE PLANS. AND IT IS A FACT MR. AGUNBIADE SAID

20 THAT HE DID NOT BELIEVE, WELL I AM STATING CATEGORICALLY IT

21 IS A FACT THAT 3,335 FEET IS BEING ADDED AND THAT IS, YES,

22 MORE THAN 11 FOOTBALL FIELDS LAID END TO END.

23 AS FAR AS THE COMMERCIAL USES OF THE HARBOR ARE

24 CONCERNED, YES, THIS IS OF GREAT CONCERN TO US BECAUSE IF YOU

25 ALLOW COMMERCIAL BOATS IN HERE, YOU HAVE DIFFERENT

3.1

1 ENVIRONMENTAL IMPACTS. BUT THE REC AND PARK DEPARTMENT HAS

2 STATED THAT ----

3 COMMISSIONER ALEXANDER: YOUR TIME HAS EXPIRED. NEXT

4 SPEAKER, PLEASE. RENE MONSHARK (PHONETIC) FOLLOWED BY RAY

5 LOTTO.

6 RAY LOTTO: MY NAME IS RAY LOTTO. I HAVE BEEN A BERTH

7 RENTER AT THE WESTERN FACILITY FOR 20 YEARS AND IT'S TRUE

8 THAT THE DOCKS ARE IN SUCH POOR CONDITION, I REALLY DO URGE

9 THAT THE COMMISSION TAKE ACTION ON GETTING SOMETHING PASSED.

10 AND I SEE ALL THE DIFFERENT ARGUMENTS AND I RECOGNIZE THAT IF

11 THERE IS JUSTIFICATION FOR IT FOR WHETHER IT WAS A PLAN ONE

12 WAY OR ANOTHER. AS FAR AS THE BREAKWATER, I THINK IT IS VERY

13 IMPORTANT TO HAVE A NEW BREAK WATER.

14 I WOULD SAY JUST BY GOING DOWN THERE AND OBSERVING YOURSELF,

15 YOU COULD SEE THAT A GOOD PORTION OF THE SLIPS ARE MOSTLY

16 UNUSABLE. MOSTLY TO A LARGE DEGREE UNUSABLE BECAUSE OF THE

17 SURGE THAT COMES IN THROUGH THAT AREA. AND BOATS HAVE BEEN -

18 MASTS HIT EACH OTHER, THE MOORING LINES BREAK. THERE ARE MANY

19 PROBLEMS ASSOCIATED WITH BOTH HARBORS, BUT THE BREAK WATER IS

20 VERY BADLY NEEDED IN THE WEST HARBOR. IT'S JUST A MATTER OF,

21 OVER THE LAST 15 YEARS, 20 YEARS, WHEN REPAIRS WERE NEEDED,

22 WE ACTUALLY GET TOGETHER OURSELVES AND WE PUT IN WHOLE FINGER

23 PIERS. WE GO TO THE LUMBERYARD, BUY THE LUMBER AND WE'VE BEEN

24 DOING ALL THE REPAIRS OURSELVES. IT'S JUST A MATTER - THERE

25 ARE A LOT OF DANGEROUS SITUATIONS THAT ARE IN EXISTENCE ON

10.1

1 THOSE DOCKS AND IT REALLY IS VERY SIGNIFICANT THAT SOMETHING
2 BE DONE AS SOON AS POSSIBLE. SO THANK YOU VERY MUCH.

3 **COMMISSIONER SUE LEE:** BILL PALMER, THEN RON MULCARE.

4 **BILL PALMER:** THANK YOU, COMMISSIONERS. AND STAFF, I GUESS

5 THERE'S NO STAFF HERE NOW, BUT THANK YOU. MY NAME IS BILL

6 PALMER. MY ADDRESS IS 226 116TH AVENUE. SAN FRANCISCO. I'VE

7 BEEN A LONG TIME HARBOR TENANT. I'M A FORMER PROFESSIONAL

8 SAILOR AND I SERVED ON THE REC AND PARK COMMISSION ON THIS

9 PROJECT. I'VE IN FACT BEEN WORKING ON THE PROJECT AT VARIOUS

10 TIMES SINCE THE MID 90S. I KNOW THAT THIS PLAN EVOLVED,

11 REALLY, FROM LOTS OF MEETINGS BY LOTS OF PEOPLE. ALWAYS VERY

12 CONTENTIOUS, BUT IT EVOLVED SINCE THE MID 80'S AS SOMETHING

13 THAT WAS SORT OF, LEAST OBJECTIONABLE IN TERMS OF, GENERALLY

14 SPEAKING THAT REQUIREMENTS FOR BUSINESS, THE GENERAL MANGER

15 OF REC AND PARK STATED THAT THE REQUIREMENTS FOR ADA

16 BATHROOMS, SHOWERS, THESE FACILITIES. A LOT OF THE STUFF IS

17 REQUIRED IN THE BOATING AND WATERWAYS ALONE.

18 THE ISSUE OF THE BREAK WATERS IS SOMETHING THAT'S VERY NEAR

19 AND DEAR TO MY HEART AND I THINK THERE ARE A LOT OF REASONS

20 WHY PEOPLE AGREE AND DISAGREE ABOUT THEM. BUT WHY IS IT

21 ESSENTIAL TO THE PROJECT? THE PROFESSIONALS WHO DESIGN IT AND

22 MARINE DESIGN IS NOT LIKE BUILDING CONSTRUCTION. I'M A GENERAL

23 CONTRACTOR. IT'S NOTHING LIKE THAT. I'VE WORKED WITH NAVAL

24 ARCHITECTS AND SOME MARINE ENGINEERS. I'M NO EXPERT AT IT BY

25 ANY MEANS, BUT THE PUBLIC AND MOST BOATERS EVEN ARE NOT

1 FAMILIAR WITH IT. IT'S AS DIFFERENT AS ADMIRALTY LAW IS FROM
2 THE SEA AS OUR LAWS ARE FROM THIS COUNTRY. I WANT TO SAY THAT
3 I WASN'T HERE FOR THE FIRST HEARING BECAUSE I DIDN'T HAVE ANY
4 NOTICE.

5 THE BERTH HOLDERS, I BELIEVE, ARE REALLY PRIME STAKEHOLDERS

6 IN THE STRICTEST SENSE OF THE WORD. WE NOT ONLY PAY FOR THE

7 ENTIRE PROJECT AND THE MAINTENANCE. AND THE OPERATION,

8 INCLUDING RUNNING THE GREEN AND PAYING FOR ALL THAT, BUT WE

9 ALL HAVE CONTRACTS WITH THE CITY. AND I BELIEVE IT'S IN THE

10 CITY CHARTER, I'M NOT SURE OF THIS, THAT WE ACTUALLY HAVE AN

11 OBLIGATION TO NOTIFY US OF ANY HEARING THAT HAS ANYTHING TO DO

12 WITH WHAT WE HAVE A STAKE IN. AND THAT'S NEVER BEEN DONE.

13 SO I'M NOT AN ACTIVIST, I'M NOT A COMMUNITY ORGANIZER, I'M

14 NOT ON TOP OF THESE THINGS AND MOST BOATERS AREN'T. EXCUSE ME.

15 THERE IS NO CITY MONEY SPENT IN THE MARINA AND A LOT OF PEOPLE

16 DON'T KNOW IT. I THINK THAT THE FACT THIS WHOLE PROCESS HAS

17 BEEN ABUSED IN THE CASE OF BRINGING THIS DRAFT BEFORE YOU WHEN

18 THERE - IT IS A DRAFT. WE'VE ALREADY SPENT I BELIEVE THE

19 MARINA HAS SPENT SOMETHING LIKE A THIRD OF ITS ANNUAL BUDGET,

20 PROBABLY 400 OR \$500,000 FOR THIS PROCESS. AND I THINK YOU

21 WILL FIND ULTIMATELY THAT THERE IS NO NEGATIVE IMPACT AND THAT

22 IT GOES ON INTO THE NEXT PHASE. IT'S A PROCESS.

23 THE MARINA AS FAR AS THE PUBLIC BENEFIT, I'M QUOTING MY

24 SUMMARY. PROVIDES ABOUT A MILLION DOLLARS TO THE REC AND PARK,

25 DPW AND SO FORTH. SO THERE IS A MILLION DOLLARS OF BENEFIT

1 THAT IS MARINA MONEY PAID THAT OFFSETS THE CITY FUND.
 2 **COMMISSIONER SUE LEE:** THANK YOU. RON MULCARE AND THEN MICHAEL
 3 SPIEGEL.
 4 **RON MULCARE:** MY NAME IS RON MULCARE. I RESIDE IN THE 600
 5 BLOCK OF THE MARINA BOULEVARD. I AM A MEMBER OF THE MARINA
 6 COMMUNITY ASSOCIATION , WHICH WILL ADDRESS YOU AND I SUPPORT
 7 ITS POSITIONS. BUT I AM HERE TO SPEAK ON A MORE PERSONAL LEVEL
 8 AND TO SPEAK AS IT RELATES TO THE SEAWALLS.
 9 WE'VE HEARD MR. ROLLO SPEAK. WE HEARD HIM SAY IN AN
 10 EARTHQUAKE THE SEAWALL WOULD MOVE THREE FEET. WE'VE HEARD HIM
 11 SAY THAT IT COULD BE STRENGTHENED, BUT IT WOULD ONLY PROVIDE
 12 IMMEDIATE SUPPORT TO THE LATERAL MOVEMENT TOWARDS THE BAY.
 13 THAT'S WHAT MARINA BOULEVARD EXPERIENCED IN THE 1989
 14 EARTHQUAKE.
 15 IT'S WHAT THE 1991 STUDY THAT THE CITY COMMISSIONED AND
 16 REPORTED THAT THE NUMBER ONE PRIORITY IN THE MARINA WAS TO
 17 PREPARE - REPAIR AND RETROFIT THE MARINA SEAWALL. NOW THE
 18 POSITION OF THE CITY STAFF IS, DO NOTHING. IN THE 1989
 19 EARTHQUAKE, MY FAMILY WAS OUT OF OUR HOME FOR TWO YEARS WHILE
 20 IT WAS BEING REBUILT. THAT HAPPENED TO 7 OF THE PROPERTIES ON
 21 MY BLOCK WHICH CONSISTS OF ONLY 11.

1 MY HOUSE SETTLED AT THE FRONT, JUST THE WAY MR. ROLLO
 2 DESCRIBED IT. THE SEAWALL MOVED, THE FRONT OF THE HOUSE WENT
 3 DOWN. I HAD A SURVEY, I KNOW THE FRONT OF THE HOUSE WENT DOWN.
 4 THE BACK AREA DID NOT FAIL. THE FRONT DOORS WERE NOT OPEN, THE
 5 BACK DOORS WOULD OPEN.
 6 NOW, WE'VE ALREADY HEARD ABOUT THE 1991 STUDIES, AND I
 7 MENTION THAT IT WAS RECOMMENDED THAT THE MARINA SEAWALL BE
 8 RETROFITTED. THE COST AT THAT TIME IN THAT REPORT, ACCORDING
 9 TO HARDING LOSS AND DANES AND MOORE WOULD HAVE BEEN \$310,000.
 10 COMPARE THAT TO THE 40 MILLION THAT THEY'RE TALKING ABOUT
 11 SPENDING NOW. UNDER THE CITY'S APPROACH, YOU DO NOTHING. IF
 12 THIS WERE A PRIVATE DEVELOPER COMING IN HERE TO DO SOMETHING
 13 AND IT WAS NOT GOING TO RETROFIT FOR SEISMIC UPGRADE, YOU
 14 WOULD SEND HIM RIGHT BACK AND SAY, DO THE STUDIES, DO THE
 15 RETROFIT.
 16 TAKE THE EXAMPLE OF THE MASONRY BUILDING. PEOPLE COME IN HERE
 17 FOR APPROVALS. YOU KNOW AS WELL AS I DO, THAT YOU REQUIRE
 18 SEISMIC UPGRADE. THE SAME STANDARD SHOULD BE APPLIED TO THE
 19 CITY THAT IS APPLIED TO PRIVATE DEVELOPERS. NOW, YOU MIGHT SAY
 20 THE MASONRY BUILDING IS OCCUPIED. THE HOMES ON MARINA
 21 BOULEVARD ARE OCCUPIED, TOO. IF THERE IS A SUBSTANTIAL
 22 EARTHQUAKE AND THAT MOVES THREE FEET, THEN ALL OF THE HOUSES
 23 ON MARINA BOULEVARD ARE LOST. THE LATERAL SUPPORT IS AN
 24 OBLIGATION OF THE CITY AS THE ADJOINING PROPERTY OWNER. WHEN I
 25 WAS INVOLVED IN THE LITIGATION AS AN ATTORNEY WHEN BART CAME

1 THROUGH MARKET STREET, THE SUPREME COURT HELD THAT WHEN BART
 2 (INDISCERNIBLE) EXCAVATION DID THE LATERAL SUPPORT, IT HAD TO
 3 PAY DAMAGES TO THOSE ADJOINING OWNERS.
 4 ANOTHER POINT THAT SHOULD BE EVIDENT IS THE FACT THAT THE
 5 SEAWALLS FORM THE HARBOR. IF THEY FALL, THEN THE HARBOR FAILS,
 6 AND TAXPAYERS WILL BE PAYING THE 40 MILLION DOLLAR LOAN OFF.
 7 SO GOOD PLANNING DICTATES THAT THERE BE A RETROFITTING OF
 8 THESE SEAWALLS. THANK YOU.

9 **MICHAEL SPIEGEL:** GOOD EVENING. MY NAME IS MICHAEL SPIEGEL.
 10 I'M A RESIDENT OF THE MARINA. I WANT TO ADDRESS THE FACT THAT
 11 -
 12 **COMMISSIONER SUE LEE:** EXCUSE ME. I CALLED RICHARD BASS AND
 13 NANCY NICHOLS.
 14 **MICHAEL SPIEGEL:** SOMEBODY CALLED MY NAME.
 15 **COMMISSIONER SUE LEE:** OH, I'M SORRY. MY MISTAKE. GO AHEAD.

16 **MICHAEL SPIEGEL:** WHAT I WANTED TO ADDRESS WAS THE FACT THAT
 17 SEEMS TO BE OVERLOOKED HERE IS THAT THE 40 MILLION LOAN FOR
 18 THIS PROPOSED PROJECT IS GOING TO BE FINANCED BY REVENUE
 19 BONDS. AND THERE ISN'T AN UNDERWRITER IN HIS RIGHT MIND THAT
 20 IS GOING TO UNDERWRITE THESE REVENUE BONDS UNLESS THERE IS A
 21 GUARANTEED STREAM OF INCOME THAT IS GOING TO PAY TO SUPPLY THE
 22 REVENUE TO PAYOFF THESE BONDS. THAT IS GOING TO MEAN THAT THIS
 23 PROJECT HAS TO BE A SOUND PROJECT. IF YOU EXAMINE THIS
 24 PROJECT, YOU NOTICE THAT THE PROJECT IS ANCHORED ON THE NORTH
 25 BY THE ST. FRANCIS SPIT SOMETIMES CALLED THE JETTY, ON THE

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1 SOUTH OF THE MARINA BOULEVARD SEAWALL.
 2 IN THE 1989 EARTHQUAKE, THE ST. FRANCIS SPIT WAS SEVERELY
 3 DAMAGED. IT MOVED TWO FEET Laterally, AND EVER SINCE THEN IT
 4 HAS BEEN, SO TO SPEAK, LEAKING SAND. SAND MIGRATES UNDER THAT
 5 SPIT INTO THE OUTER HARBOR. AND THAT CAUSES TO SOME EXTENT THE
 6 FACT THAT THE BERTHS THAT WERE ALONG THE GOLDEN GATE YACHT
 7 CLUB TO BE USELESS. IN FACT, IN THE YEAR 2005, IN MAY AND IN
 8 NOVEMBER ON AN EMERGENCY BASIS, SAND EXCAVATION HAD TO BE DONE
 9 DREDGING IN THAT AREA. AND I'M TOLD THAT THE SAND IS ALMOST
 10 ALL BACK IN THERE AGAIN. AND THE WAY THIS PROJECT IS LAID OUT,
 11 EVEN ASSUMING YOU BUILD THESE BREAK WATERS, THAT IS NOT GOING
 12 TO STOP THE SAND FROM MIGRATING UNDER THAT JETTY INTO THE
 13 HARBOR. AND OF COURSE WITH THE BREAK WATERS THERE, THE JOB OF
 14 DREDGING IS GOING TO BE THAT MUCH MORE DIFFICULT.
 15 BUT THE MAIN POINT IS, I DON'T SEE HOW ANY UNDERWRITER IN HIS
 16 RIGHT MIND IS GOING TO APPROVE THIS BOND ISSUE UNDER THOSE
 17 KINDS OF CIRCUMSTANCES. AND THAT DOESN'T SPEAK, AGAIN, OF THAT
 18 SEAWALL. I MEAN, IF YOU HAVE TWO ANCHORS TO THIS PROJECT THAT
 19 ARE BOTH VULNERABLE THAT EVERYBODY ADMITS, WHY WOULD ANYBODY
 20 WANT TO UNDERWRITE THOSE BONDS. SO IT SEEMS TO ME, RATHER THAN
 21 SPIN OUR WHEELS HERE, TALKING ABOUT THE NICETIES OF THIS
 22 PROJECT, WE WANT TO MAKE SURE THIS PROJECT IS ON A SOUND
 23 FOOTING SO IF THE LOAN IS APPROVED, IT IS GOING TO BE
 24 UNDERWRITTEN. THANK YOU.
 25 **COMMISSIONER SUE LEE:** NOW I THINK IT'S RICHARD BASS.

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1 NANCY NICHOLS, LAVERNE CISCO (PHONETIC), ALAN SILVERMAN, DICK
2 ROBINSON.

3 **ALAN SILVERMAN:** GOOD EVENING, COMMISSIONERS. I'M ALAN
4 SILVER MAN FROM THE MARINA COMMUNITY ASSOCIATION. I'D LIKE TO
5 ADDRESS SOME OF THE THINGS THAT MR. ROLLO SAID AND TRY TO USE
6 ONE OF THESE CHARTS, IF I MAY. SEE IF THIS WORKS. DO I HAVE TO
7 DO SOMETHING? OKAY.

8 THIS IS WHAT MR. ROLLO MENTIONED, A LIQUEFACTION STUDY IN
9 WHICH HE PARTICIPATED. THIS IS A STUDY THAT WAS DONE IN 1991.
10 THE STUDY, QUOTE, AND I'M QUOTING HERE, THE FAIR'S SEAWALL
11 WHICH IS ONE OF THE SOUTHERN BOUNDARIES OF THE HARBOR, TO
12 WHICH ONE OF THE BREAK WATERS WILL BE ATTACHED, SETTLED AFOOT
13 AND CRACKED ALONG SEVERAL INCHES WIDE ALONG 50 FEET. THE
14 MARINA SEAWALL WAS DAMAGED AND SETTLED UP TO TWO FEET AND THE
15 ST. FRANCIS SPIT MOVED LATERALLY TWO FEET AND THEN SETTLED
16 ANOTHER FOOT.

17 IN A FUTURE EARTHQUAKE OF THE 1906 KIND, THE FAIR'S SEAWALL
18 WHICH IS THE SOUTHERN BOUNDARY TO WHICH THE BREAK WATER WOULD
19 BE ATTACHED MIGHT MOVE FOUR TO EIGHT FEET, SO THE WALL IS
20 GOING TO MOVE, THE BREAK WATER WHICH IS WELL CONSTRUCTED, WILL
21 NOT MOVE. THE SOUTHERN BOUNDARY HARBOR IS GOING TO GO. THE
22 MARINA BOULEVARD SEAWALL MIGHT MOVE TOWARDS THE BAY. AND THE
23 ST. FRANCIS SPIT, WHICH IS ALREADY DAMAGED AND LEAKING SAND
24 UNDER THE SPIT, WILL MOVE FIVE FEET. THE OTHER BREAK WATER IN
25 THE WEST HARBOR IS GOING TO BE ATTACHED TO THE ST. FRANCIS

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1 SPIT AND IT WILL MOVE FIVE FEET.

2 THE POINT THAT MR. ROLLO MADE ABOUT THIS WILL DO NOTHING TO
3 PROTECT THE HOUSES IN THE MARINA SEEMS TO LOSE THE POINT. THE
4 POINT IS DOES IT PROTECT THE SEISMIC RETROFITTING PROTECT, THE
5 40 MILLION DOLLARS THAT YOU'RE PUTTING INTO THIS PROJECT WHEN
6 THE SEAWALL AND THE SPIT ARE THE NORTHERN AND SOUTHERN

7 BOUNDARIES OF THE PROJECT. SO I WOULD SUGGEST TO YOU THAT,
8 FORGET ABOUT AS MUCH AS I SYMPATHIZE WITH MR. MULCARE'S HOUSE,
9 FORGET ABOUT HIS HOUSE. YOU'RE TALKING ABOUT SPENDING 40

10 MILLION DOLLARS OF THE CITY'S MONEY AND THE COLLATERAL FOR THE
11 LOAN, IF YOU READ THE DEPARTMENT OF BOATING AND WATERWAYS, THE
12 COLLATERAL FOR THE LOAN IS THE HARBOR ITSELF. SO THE

13 COLLATERAL IS GOING TO DISAPPEAR INTO THE BAY ALONG WITH THE
14 SEAWALLS. THERE ARE MANY OTHER THINGS THAT COULD BE ADDRESSED
15 ABOUT THE PRESENTATION WE JUST HAD, BUT I THINK I'LL WAIT
16 UNTIL WE GET TO THE DEIR.

17 THANK YOU.

18 **COMMISSIONER SUE LEE:** COME UP. OTHERWISE ERIN ROACH,
19 BRUCE

20 STONE, RUTH MONROE, SUE CHANG, NATHANIEL BERKOWITZ. DON'T BE
21 SHY, JUST COME UP TO THE MIC. WE HAVE A LONG NIGHT AHEAD OF
22 US.

23 **DICK ROBINSON:** MY NAME IS DICK ROBINSON. I AM A MARINA
24 HOMEOWNER FOR OVER TWO DECADES, A BOAT OWNER FOR OVER TWO
25 DECADES, AND A SLIP HOLDER FOR OVER TWO DECADES. SO I HAVE

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1 MANY ANGLES OF INTEREST IN THIS.
 2 I THINK WE ALL AGREE THAT THE HARBOR IS IN DISREPAIR AND
 3 NEEDS A MAJOR OVERHAUL. I AM IN FAVOR OF PROCESSING THIS EIR
 4 AS IT IS CURRENTLY BEING PRESENTED TO YOU. I AM NOT PART OF
 5 ANY OF THE ALLEGED NEIGHBORHOOD GROUPS PRESENTED BY THE FIRST
 6 SPEAKER, AND I BELIEVE THERE ARE MANY OTHER HOMEOWNERS AND
 7 SLIP HOLDERS WHO WOULD SAY THE SAME THING.
 8 I'M CONCERNED PRIMARILY WITH THE TIMING ASPECT, AND ANY
 9 MODIFICATION OF THE EIR IS GOING TO POTENTIALLY SEND US INTO
 10 AN ANALYSIS PARALYSIS SYNDROME, AND IT WILL FURTHER DELAY THE
 11 TIMING, AND THEREFORE THE COST OF THIS PROJECT.
 12 THE EIR AS I UNDERSTAND IT, MUST INCLUDE ALL OF THE
 13 CONTEMPLATED CHANGES TO THE MARINA, IRRESPECTIVE OF WHETHER OR
 14 NOT THEY ULTIMATELY ARE BUILT. SO YOU CAN'T COME BACK AT A
 15 LATER POINT AND ADD SOMETHING TO AN EIR WITHOUT GOING THROUGH
 16 THE PROCESS AGAIN. SO I BELIEVE THE ALL INCLUSIVE NATURE OF
 17 WHAT IS BEING PRESENTED THROUGH REC AND PARK WILL AT LEAST
 18 ENABLE THEM TO CULL THAT AT POTENTIALLY A LATER DATE IF
 19 NECESSARY.
 20 WITH REGARD TO THE POINT THAT WAS MADE EARLIER REGARDING
 21 SMALLER SLIPS HERE, I BELIEVE THE DEMAND IS FOR LARGER SLIPS
 22 OVER ALL, AND I THINK THE HARBOR MASTER WOULD SUPPORT THAT
 23 POSITION.
 24 THERE IS A LONG LIST OF PEOPLE LOOKING FOR LARGER SLIPS, AND
 25 SO I'M NOT SURE YOU CAN SOCIALLY ENGINEER THE TYPE OF BOATS

1 THAT PEOPLE SAIL BY VIRTUE OF WHAT IS THERE NOW. I THINK THE
 2 DEMAND IS FOR LARGER SLIPS. I DON'T WANT YOU TO HAVE THE
 3 IMPRESSION THE ENTIRE NEIGHBORHOOD IS AGAINST THAT, AGAINST
 4 THIS EIR BECAUSE IT IS NOT.
 5 AND I AM AN EXAMPLE OF ONE WHO WOULD LIKE TO SEE THIS PROCESS
 6 MOVE FORWARD AS SOON AS POSSIBLE. AND OVER ALL, SAN FRANCISCO
 7 DOES DESERVE A SELF, AND SUSTAINING HARBOR. THERE IS A BOATING
 8 VENUE HERE FOR WHICH SAN FRANCISCO AND THE LOCAL RESIDENTS AND
 9 BOATERS IN PARTICULAR, SHOULD REALLY SHOWCASE. AND THE SOONER
 10 WE GET THIS PROJECT GOING, THE BETTER WE WILL ALL BE. THANK
 11 YOU.
 12 **COMMISSIONER SUE LEE:** NEXT SPEAKER, SUZANNE LIFSON, JOHN
 13 EVANS, PLEASE, IF I'VE CALLED YOUR NAME, PLEASE COME UP.
 14 **SUE CHANG:** I'M SUE CHANG, MARINA ASSOCIATION. 55 CASA WAY
 15 APARTMENT 201. AND I'M SPEAKING ABOUT THE SCOPE OF THE
 16 PROJECT.
 17 THIS IS A LITTLE BIT OF A DIFFERENT VIEW OF MY REASON FOR
 18 ASKING YOU TO CONSIDER A SEISMIC UPGRADE OF THE SEAWALL. THIS
 19 IS OCTOBER, THIS IS FLEET WEEK. THERE ARE A LOT OF PEOPLE
 20 THERE. LOMAPRIETA HIT IN OCTOBER. IT'S A GOOD THING IT WASN'T
 21 THAT WEEKEND. IT'S NOT ABOUT THE HOMES IN THE MARINA, IT'S NOT
 22 ABOUT THIS AREA THERE AREN'T EVEN BOATS ON THE OTHER SIDE OF
 23 IT. IT'S THE SEAWALL AND YOU HAVE A LOT OF PEDESTRIANS THAT
 24 SPEND A LOT OF TIME RIGHT ALONG THOSE PATHWAYS AND YOU'RE
 25 PUTTING THEIR LIVES AT RISK IF YOU DON'T DO EVERYTHING THAT

1 YOU CAN TO SEISMICALLY UPGRADE THE SEAWALLS. I HAVE A FOUR
2 YEAR OLD, SEVEN YEAR OLD AND A NINE YEAR OLD. THEY SPEND A LOT
3 OF TIME OUT BY THOSE SEAWALLS.

4 THE OTHER THING THAT I THINK IS VERY IMPORTANT THAT WASN'T
5 INCLUDE IN THE PROJECT SCOPE IS THE MARINA GREEN AND THE FACT
6 THEY WANT TO BUILD A BUILDING ON THE EAST MARINA GREEN WHEN
7 THE WEST MARINA GREEN AND THE MAIN MARINA GREEN IS FULLY
8 OCCUPIED AND PERMEATED MOST OF THE TIME, THE EAST OPEN SPACE
9 IS ONE OF THE ONLY SPACES NOT PERMITTED OUT. ALL THE OPEN
10 SPACE IS CRUCIAL TO US.

11 A COUPLE POINTS THAT HAVE BEEN MADE. I CAN JUST ADDRESS. I
12 KNOW THAT SHOWERS IN REGARDS TO THE EXPANSION, SHOWERS ARE NOT
13 REQUIRED BY THE DEPARTMENT OF BOATING AND WATERWAYS. THEY ARE
14 NOT EVEN INCLUDED IN THEIR GUIDELINES FOR SMALL CRAFT HARBOR
15 RENOVATIONS. WHAT THEY WILL PAY FOR IS INFRASTRUCTURE, THEY
16 WOULD HAVE PAID FOR SEISMIC UPGRADE TO - OR THEY WOULD HAVE
17 CONSIDERED SEISMIC UPGRADES, FINDING FOR THE SEISMIC UPGRADE
18 WOULD HAVE BEEN ELIGIBLE FOR DEW FUNDING HAD IT BEEN IN THE
19 ORIGINAL PROJECT. THEY WOULD HAVE PAID FOR PARKING

20 IMPROVEMENTS.
21 RIGHT NOW THERE IS A VAST EXPANSE OF PARKING LOTS RIGHT
22 ALONG THE OPEN SHORELINE THERE. IF YOU DO LOOK AT THEIR
23 GUIDELINES, THE DEW GUIDELINES, ENCOURAGE THAT YOU BREAK UP
24 LARGE EXPANSES OF ASPHALT WITH PLANTING MEDIANS AND STRIPS AND
25 THINGS TO BEAUTIFY THE SHORELINE. NONE OF THAT HAS BEEN

1 INCLUDED IN THIS PROJECT. I'M CONCERNED ABOUT THE LACK WHEN WE
2 TALK ABOUT LACK OF PUBLIC BENEFITS, THE PATHWAYS, FOR THE MOST
3 PART, AFTER THE 40 MILLION PROJECT DOLLAR IS DONE, THE
4 LAYPERSON THAT IS NOT A BOATER THAT GOES TO THIS PARK, ONE OF
5 THE HUNDREDS OF THOUSANDS OF PEOPLE THAT USE THIS PARK,
6 PROBABLY WON'T EVEN NOTICE MUCH, WHICH I THINK IS SAD, BECAUSE
7 40,000 EXCUSE ME, 40 MILLION DOLLARS IS A LOT OF MONEY TO
8 SPEND WHEN IT'S A PUBLIC PARK. THANK YOU.

9 **NATHANIEL BERKOWITZ:** MY NAME IS NATHANIEL BERKOWITZ AND I'M
10 HERE WITH SEVERAL HATS. WE OWN A FAMILY HOME IN THE MARINA
11 RIGHT UNDERNEATH THAT LIQUEFACTION AREA. FORTUNATELY IT
12 SURVIVED THE 89' EARTHQUAKE WHILE THE APARTMENTS ACROSS THE
13 STREET FELL DOWN. I'VE BEEN A TENANT IN THE HARBOR OVER 40
14 YEARS. I UNDERSTAND THE SAILING AND I THINK I UNDERSTAND THE
15 MOTIVATIONS OF WHAT IS HAPPENING HERE AND WHY NOTHING IS GOING
16 TO WORK.

17 THE DEVIL IS IN THE DETAILS. IF THIS EIR HAS BEEN PUT
18 TOGETHER AS A PRIMARY METHOD OF OBTAINING 40 MILLION DOLLARS
19 OF STATE OF CALIFORNIA BOATING FUNDS. WELL, I THINK IT'S FINE,
20 BUT I THINK THE FIRST THING THAT SHOULD HAVE BEEN DONE IS TO
21 BE CONCERNED ABOUT WHAT IS BEST FOR THE HARBOR AND WHAT IS
22 BEST FOR THE CITY AND COUNTY OF SAN FRANCISCO.
23 I'D LIKE TO TALK ABOUT A COUPLE OF DETAILS. I'M TOTALLY
24 AGAINST ANY BREAK WATERS. I THINK THAT THERE IS A WAVE ORGAN
25 THAT WAS SURREPTITIOUSLY BUILT AND PUT ONTO THE ST. FRANCIS

1 SPIT, NOT TOO MANY YEARS AGO. IT HASN'T OPERATED FOR OVER A
 2 DOZEN YEARS THAT I KNOW OF. AND IT WAS PUT IN AT THE MOST
 3 WRONG ANGLE. I'D RELOCATE THE WAVE ORGAN. I WANT TO TALK
 4 SPECIFICS. I'D RELOCATE THE WAVE ORGAN. I'D MOVE THE ORGAN
 5 JETTY FROM A NORTHEASTERLY TO A SOUTHEASTERLY ORIENTATION.
 6 THAT CHANGE WILL REDUCE THE AMOUNT OF SEDIMENTATION, WHICH IS
 7 WHY YOU ARE GETTING THE SAND CROWDING INTO THE HARBOR. AND IT
 8 WILL ELIMINATE THE NEED FOR BUILDING A NEW BREAKWATER. IF YOU
 9 PUT IN A NEW BREAK WATER, YOU ARE CATERING TO THE LARGE MOTOR
 10 YACHTS BECAUSE THE YOU WILL NO LONGER BE ABLE TO SAIL A BOAT
 11 INTO THE HARBOR, BUT WILL BE REQUIRED TO USE A MOTOR. NOT TOO
 12 GOOD.
 13 NUMBER TWO IS I WOULD LIKE IT RELOCATE THE DEGAUSSING
 14 STATION. IT'S WHERE IT IS ONLY BECAUSE THAT'S WHERE THE NAVY
 15 INSTALLED THEIR LOOP OF WIRE UNDERNEATH THE BAY. I THINK IT'S
 16 WORTH SAYING. I THINK IT SHOULD BE MOVED BACK TO NEAR WHERE
 17 THE HARBOR MASTERS BUILDING IS TODAY. AND I THINK IT COULD
 18 THEN BE USED OR REMODELED TO PROVIDE SUFFICIENT ADA PUBLIC
 19 REST ROOMS. MIXING THE PUBLIC REST ROOMS AND THE BOATING REST
 20 ROOMS AS IT IS TODAY IS REALLY A VERY UNPLEASANT EXPERIENCE.
 21 NUMBER TWO, NUMBER THREE. I WOULD LIKE TO TALK ABOUT
 22 EXTENDING THE WEST BASIN TO THE EXISTING WESTERN HARBOR WALL.
 23 THIS HAS ALL BEEN WRITTEN AND I HAVE RECEIVED NO RESPONSE FROM
 24 THE PLANNING DEPARTMENT OR FROM THE DEPARTMENT PARK AND REC
 25 ABOUT THIS LETTER THAT I'VE BEEN READING FROM. THANK YOU VERY

1 MUCH.
 2 **COMMISSIONER SUE LEE:** THANK YOU VERY MUCH. NEXT SPEAKER,
 3 PLEASE.
 4 **SUZANNE LIFSON:** GOOD EVENING. MY NAME IS SUZANNE LIFSON. I
 5 AM THE DIRECTOR OF CLIENT SERVICES FOR FORT MASON FOUNDATION.
 6 I'M HERE ON BEHALF OF FORT MASON FOUNDATION AS WELL AS THE
 7 NATIONAL PARK SERVICE. AND I CAN SAY SUCCINCTLY THAT WE WOULD
 8 LIKE TO SAY THE DRAFT EIR REMAIN A DRAFT UNTIL SOME SPECIFICS,
 9 MANY SPECIFICS ARE ADDRESSED. 2.4
 10 THANK YOU.
 11 **COMMISSIONER SUE LEE:** NEXT SPEAKER, PLEASE. SEEING NONE, I
 12 ASKED JOAN GIRARDOT TO COME BACK. I PROMISED YOU 8 MINUTES AT
 13 THE BEGINNING AND I UNDERSTAND THAT WASN'T GIVEN TO YOU WHEN
 14 YOU CAME UP. SO IF YOU'D LIKE TO COMPLETE YOUR COMMENTS.
 15 **JOAN GIRARDOT:** THANK YOU, COMMISSIONER. I DON'T KNOW WHERE
 16 I AM IN MY COMMENTS. ARE YOU FINISHED WITH THE PUBLIC COMMENT
 17 ON THIS ITEM?
 18 YES, SIR. THE PROJECT SPONSORS OBJECTIVES, 1 AND 5 APPEAR TO
 19 BE LEGITIMATE OBJECTIVES. BUT THE OTHERS APPEAR TO BE MADE UP
 20 IN ORDER TO SATISFY WELL, LET ME BACK UP.
 21 THIS DOCUMENT RIGHT HERE IS A FORECAST OF VOTING ACTIVITY AND
 22 FACILITY NEEDS PUT OUT BY THE LENDING AGENCY DEPARTMENT OF
 23 BOATING AND WATERWAYS. AND THEIR FORECASTS SAY THE DEMAND ON
 24 THE BAY IS FOR SMALLER BOATS GOING OUT TO THE YEAR 2025. THIS 2.3
 25 IS AN OFFICIAL DOCUMENT. AND IT DIRECTLY CONTRADICTS OBJECTIVE

1 NUMBER 3 WHICH SAYS THAT WE ARE DOING ON PAGE 2-12 WHICH SAYS
 2 THAT WE'RE DOING THIS PROJECT TO, QUOTE, PROVIDE A SLIP SIZE
 3 DISTRIBUTION THAT MORE CLOSELY MATCHES MARKET DEMAND.
 4 WELL, REC AND PARK HAS A STUDY FROM THEIR CONSULTANT, A SOLE
 5 SOURCE CONTRACTOR REC AND PARK THAT SAYS MARKET DEMAND IS FOR
 6 THE LARGER BOAT. BUT THIS STUDY SAYS IT'S FOR THE SMALLER
 7 BOAT. AND WE'RE RIPPING EVERYTHING OUT, EVERYTHING OUT TO
 8 REDESIGN IN ORDER TO FACILITATE LARGER BOATS.
 9 SECONDLY, ABOUT THE DEGAUSSING STATION, THE DEGAUSSING
 10 STATION WAS PERMITTED WITH A SPECIAL USE PERMIT TO THE NAVY IN
 11 1951. AND THE PERMIT REQUIRED THE NAVY TO DEMOLISH THE
 12 BUILDING AND RETURN THE SITE TO OPEN SPACE WHEN THEY
 13 DETERMINED THAT IT WAS NO LONGER NEEDED BY THEM. THAT WAS THE
 14 TREASURE ISLAND COMMAND. AND REC AND PARK AT THE TIME THEY
 15 ALLOWED THE NAVY TO WALK AWAY FROM THAT REQUIREMENT, SAID THAT
 16 THEY WOULD REUSE THE BUILDING WITH A LOW KEY USE. AND NOW YOU
 17 HAVE A U.S. CUSTOMER SERVICE CENTER. RETROFIT OF THE EXISTING
 18 SEAWALL, I WAS THE PERSON WHO WENT TO THE BOARD OF SUPERVISORS
 19 IN 1991 AND CONVINCED SUPERVISOR TOM SHEA TO SPONSOR
 20 LEGISLATION TO CREATE THIS TASK FORCE, THE REPORT OF WHICH WAS
 21 ISSUED IN 1992. AND IT SAID THERE WERE 13 RECOMMENDATIONS. AND
 22 THE FIRST ONE WAS TO SEISMICALLY RETROFIT THE MARINA BOULEVARD
 23 SEAWALL AND THE THIRD HIGHEST PRIORITY WAS TO SEISMICALLY
 24 RETROFIT THE FAIR'S SEAWALL. WHAT I AM URGING YOU TO DO IS
 25 FIND A WAY TO REQUIRE THIS AS PART OF THE PROJECT.

1 WHETHER IT'S SEARCHING THE CODE, MR. CORNFIELD SEARCHED THE
 2 CODE FOR ME. HE SAID THERE ARE CODES REGARDING RETAINING
 3 WALLS. WE CANNOT KNOW THAT THESE ARE GOING TO FAIL AND THEN
 4 NOT ACT. WE CANNOT DO THAT. WE CANNOT ALLOW THAT TO HAPPEN.
 5 THAT'S WHAT HAPPENED IN NEW ORLEANS. THANK YOU.
 6 **COMMISSIONER SUE LEE:** THANK YOU. ARE THERE ANY OTHER
 7 SPEAKERS ON THIS ITEM AT THIS TIME PLEASE COME UP TO THE MIC.
 8 **JOHN EVANS:** HI, I'M JOHN EVANS. AND I'D LIKE TO SPEAK IN
 9 FAVOR OF MOVING THIS PROCESS FORWARD AND IN FAVOR OF THE DRAFT
 10 ENVIRONMENTAL IMPACT STATEMENT DID NOT SAY THERE WAS ANYTHING
 11 NEGATIVE ABOUT REDOING THE MARINA. A LOT OF MY - I HAVE A BOAT
 12 IN THE MARINA AND I REALLY BELIEVE - I DON'T KNOW AS MUCH AS A
 13 LOT OF THESE PEOPLE. BUT I REALLY DO BELIEVE WE NEED TO CREATE
 14 BERTHS THAT ALLOW FOR THE BOATS TO BE TO CHANGE THE DIRECTION
 15 OF THE BOATS. A LOT OF US WHO WENT DOWN TO THE MARINA DURING
 16 THE RECENT STORMS AND YOU SEE ALL THE BOATS. THEY'RE GETTING
 17 PULLED TO ONE SIDE WITH 40 KNOT WINDS. IT WOULD BE NICE TO
 18 RECONFIGURE THE MARINA SO BOATS CAN GO FROM EAST TO WEST
 19 INSTEAD OF NORTH TO SOUTH.
 20 THE MARINA CONTRIBUTES ABOUT 1.3 MILLION DOLLARS TO THE
 21 GENERAL FUND IN THE CITY. I AS A SAILBOAT OWNER WHO DOES NOT
 22 HAVE A MOTOR ON THE BOAT DO NOT THINK IT WILL BE, I'LL
 23 DISAGREE WITH THE OTHER FELLOW, I DON'T THINK IT WILL BE
 24 DIFFICULT FOR US TO MOVE OUR BOATS IN AND OUT OF THE HARBOR
 25 WITH THE BREAK WATER. I THINK THE BREAK WATER IS REALLY

2.3
 con't

1 IMPORTANT.

2 I THINK THAT IT WAS IMPORTANT TO GET A DRAFT ENVIRONMENTAL

3 STATEMENT, TO MAKE SURE THAT WE CAN MOVE ON WITH THIS PROCESS.

4 AND I THINK WE SHOULD CONTINUE TO MOVE ON AND I THINK WE

5 SHOULD GIVE THIS PROJECT THE CONSIDERATION IT DESERVES. AND

6 THERE ARE A LOT OF PEOPLE WHO SAIL OUT OF THE MARINA WHO WANT

7 TO SEE THESE CHANGES MADE. DON'T FEEL LIKE THERE IS GOING TO

8 BE A NEGATIVE IMPACT ON THE MARINA OR THE PARK OR THE PEOPLE

9 WHO LIVE THERE. AND YOU PROBABLY KNOW THAT THIS IS ONE OF THE

10 GREATEST PLACES IN THE WORLD TO RACE SAIL BOATS. THESE AREN'T

11 RICH PEOPLE LIKE LARRY ELLISON. THESE ARE ORDINARY PEOPLE WHO

12 SPEND TIME AND MONEY GOING OUT EVERY MONDAY, WEDNESDAY,

13 FRIDAY, ALL YEAR ROUND, RACING SAIL BOATS. IT IS AN ENORMOUS

14 CONTRIBUTION TO OUR CITY AND WHAT MAKES THE CITY GREAT. AND IT

15 IS SOMETHING YOU DON'T NOTICE IF YOU'RE NOT OUT THERE. I LIVED

16 OUT THERE. I LIVED IN THE CITY A FEW YEARS BEFORE I WENT OUT

17 THERE. I THINK MAKING THE MARINA A PLACE WHERE BOATS CAN

18 OPERATE WELL, WHERE YOU CAN GET LARGER BOATS A LOT OF THE

19 BOATS THAT RACE ON THE BAY AREN'T 20 FOOT BOATS. YOU CAN'T

20 RACE A 20 FOOT BOAT OR YOU'RE GOING TO GET REALLY WET. MY SON

21 CAN, BUT I CAN'T. MOST BOATS IN THE BAY ARE 30 FEET TO 40

22 FEET, AND IT'S NOT A LOT IF YOU'RE ON THE BAY. SO THESE PEOPLE

23 CAN GO INTO ALL THE DETAILS. I HOPE YOU GUYS ALLOW THIS

24 PROCESS TO GO FORWARD AND THAT IT IS NOT STOPPED, AND THAT WE

25 GET THE CHANGE IN THE MARINA. THANKS.

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1 **GLORIA FONTANELLO:** GOOD AFTERNOON, COMMISSIONERS, MY NAME

2 IS GLORIA FONTANELLO, OLD MEMBER OF THE CIVIC IMPROVEMENT AND

3 PROPERTY OWNERS BOARD. AND AS A RESIDENT FOR 35 YEARS IN THE

4 NEIGHBORHOOD, IT'S SAD TO WATCH THIS DAY WHERE IT SOUNDS AGAIN

5 LIKE THE HOMEOWNER PITTED AGAINST THE BOAT OWNER AND ALL THE

6 DIFFERENT ARGUMENTS. I SAT ON THE ADVISORY BOARD. WE WENT FOR

7 FOUR YEARS. WE WERE ALWAYS THE DISSENTING VOTE BECAUSE WE WERE

8 THREE AGAINST THE OTHER EIGHT, NINE OR TEN.

9 IT WAS JOAN GIRARDOT, EMERIC KALMAN AND MYSELF. WE KNEW THAT

10 GOING IN, BUT WE THOUGHT LET'S GO ON THE RECORD BECAUSE WE

11 WERE ALWAYS BLAMED FOR HOLDING UP THIS PROJECT FOR SO MANY

12 YEARS, WHICH WAS NOT THE CASE. WE HAVE ALWAYS SUPPORTED THE

13 REPLACING AND THE REPAIR OF THIS HARBOR TO A WORLD CLASS

14 HARBOR, ALWAYS. WE NEVER UNDERSTOOD THE DEFERRED MAINTENANCE

15 THAT WENT ON YEAR AFTER YEAR AFTER YEAR. WE WATCHED THE HARBOR

16 MASTERS, WE WATCHED THE POLITICS GO ON, AND WE'VE BEEN THROUGH

17 AT LEAST FOUR SUPERINTENDENTS OF THE REC AND PARK, FOUR

18 MAYORS, RATHER, AND THREE OR FOUR HEADS OF THE DEPARTMENTS. WE

19 USED TO SAY TO THEM, WHY CAN'T WE GET ADA MONEY FOR THE

20 BATHROOMS? THEY'RE PERFECTLY FINE. WHY CAN'T WE REPAIR WHAT'S

21 THERE ALREADY WE ALREADY HAVE THE STRUCTURE IN THE WEST

22 HARBOR, WE HAVE THE HARBOR MASTER, AND WE HAVE BATHROOMS IN

23 THE EAST HARBOR. WHY CAN'T WE GO AFTER FUNDS THERE, WE USED TO

24 ASK, WHY CAN'T THE DEGAUSSING STATION BE TAKEN DOWN LIKE THE

25 NAVY THOUGHT WOULD HAPPEN. WE ASKED FOR IT AS A SENIOR CENTER

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1 OVER AT MOSCONE PARK. NO. WE ASKED FOR A SENIOR OR CHILD
 2 CENTER TO BE MOVED TO THE PRESIDIO. OH, NO, NO. WE HEARD
 3 PEOPLE WANTED OFFICES.
 4 SO WE SAIS TO THEM, BEHIND THE EXISTING HARBOR MASTER'S
 5 OFFICE, WE SAID TO THEM, THERE IS LAND EXISTING BEHIND THE
 6 HARBOR MASTERS OFFICE TO DOUBLE THE SIZE OF THAT HARBOR MASTER
 7 OFFICE. YOU CAN GLASS THE SIDE THAT FACES THE EAST HARBOR IF
 8 THEY WANT A BETTER VIEW OF WHAT'S GOING ON THE EAST HARBOR.
 9 BUT LEAVE THE DEGAUSSING STATION, TAKE IT DOWN, RATHER AND
 10 LEAVE THAT OPEN SPACE. YOU CAN ALSO GET ABOUT NINE MORE CARS
 11 IF YOU NEEDED MORE PARKING OUT THERE. PEOPLE FOR YEARS HAVE
 12 COME TO THE MARINA BECAUSE IT'S FREE. THEY COME DOWN THERE,
 13 JUST SIT IN THEIR CAR FOR NO REASON. AND THIS IS GOING TO
 14 IMPACT THE MARINA GREEN.
 15 A 40 MILLION DOLLAR PLAN, BREAK WATER, EVEN THE BOAT LAUNCH.
 16 I CAN SEE THE BACK UP TRAFFIC GOING ALL THE WAY DOWN BUCHANAN 9.19
 17 STREET BECAUSE EVERYONE WOULD LOVE TO ACCESS THE BAY. I WAS
 18 ALWAYS UNDER THE IMPRESSION, I'M NOT A BOAT MARITIME PERSON,
 19 BUT I WAS ALWAYS UNDER THE IMPRESSION THAT IT'S DANGEROUS TO
 20 ENTER, THAT'S WHY WE DON'T ALLOW ANYONE TO ACCESS IT UNLESS
 21 YOU'RE IN A BOAT, THAT YOU ALWAYS HAD CHRISSEY FIELD IF YOU HAD
 22 YOUR OTHER KAYAKS OR YOU HAD YOUR SAILS. ANYWAY, I URGE YOU
 23 ALSO FIND A WAY TO FIND SOMETHING TO HELP WITH THE SEAWALLS. I
 24 THINK THAT IS A MATTER OF PUBLIC SAFETY. THANK YOU,
 25 COMMISSIONERS.

1 COMMISSIONER SUE LEE: IS THERE ANY OTHER PUBLIC COMMENT? ALL
 2 RIGHT. PUBLIC COMMENT IS CLOSED. A COUPLE OF COMMISSIONERS NOW
 3 HAVE COMMENTS.
 4 COMMISSIONER OLAGUE: I GUESS WHEN I LOOK AT THE PROJECT
 5 AREA, THIS MAP, I SHARE A LOST OF THE KIND OF QUESTIONS I
 6 GUESS THAT I'M HEARING FROM THE PUBLIC IN REGARDS TO THE
 7 SEISMIC UPGRADE OF THE SEAWALL. BECAUSE A LOT OF THE AREA
 8 AROUND MOST OF THE AREA SURROUNDING THAT PART OF THE SEAWALL
 9 IS IN THE PROJECT AREA, INCLUDING A BUILDING, THE RENOVATION
 10 OF AN EXISTING BUILDING IS PART OF THE PROJECT AREA. BUT THE
 11 SURROUNDING SEAWALL ISN'T PART OF THAT - ISN'T BEING
 12 CONSIDERED FOR A SEISMIC UPGRADE AND I DON'T REALLY FOLLOW WHY
 13 THAT IS.
 14 I THINK IT SEEMS TO ME, THAT IT WOULD BE BENEFICIAL TO
 15 INCLUDE THAT IN THE PROJECT AREA, TO INCLUDE A SEISMIC
 16 UPGRADE. AND SO I JUST THINK IT WOULD BE BENEFICIAL. I'M NOT
 17 SURE WHY IT WASN'T INCLUDED WHEN MOST OF THE AREA AROUND IT
 18 IS. I MEAN, IF PEOPLE LOOK AT THE MAP.
 19 YOMI AGUNBIADE: MAYBE I'LL HAVE MR. ROLLO COME BACK UP AS
 20 FAR AS THE CONFUSION OF WHAT HAPPENED DURING THE 89'
 21 EARTHQUAKE DURING THE FAIR'S SEAWALL AND THE MARINA SEAWALL,
 22 WHICH ONES MOVED, WHICH ONES WERE ACTUALLY CONNECTED. THERE
 23 WERE SOME STATEMENTS THAT WERE MADE AROUND WHAT WOULD HAPPEN
 24 TO THE BREAK WALL CONNECTED TO THE SEAWALL.
 25 COMMISSIONER OLAGUE: I GUESS I'D LIKE TO HEAR WHAT THE

1 BENEFITS OF SEISMICALLY UPGRADING THE SEAWALL WOULD BE.
 2 **YOMI AGUNBIADE:** OKAY, AND I THINK THAT IS WHERE MR. ROLLO
 3 CAME IN AND SAID, YES, THE STUDIES THAT HAVE BEEN DONE ALL
 4 THESE YEARS SHOW THAT YOU COULD SEISMICALLY UPGRADE IT. YOU
 5 COULD ADD PILING, YOU COULD DO WORK TO IT, BUT IT DOESN'T
 6 CHANGE ANYTHING AS FAR AS HOW THE SEAWALL ITSELF AND I'LL LET
 7 HIM TELL YOU EXACTLY HOW THE SEAWALL ITSELF IS GOING TO
 8 ACTUALLY RESPOND TO A 1906 EARTHQUAKE. WILL THE MOTION STILL
 9 BE THE SAME? THE RISKS ARE STILL OUT THERE, THE LIQUEFACTION
 10 WILL STILL HAPPEN EVEN AFTER WHAT WE'RE SPENDING TODAY. I
 11 UNDERSTAND WHAT THE COMMUNITY IS SAYING, WHAT JOAN GIRARDOT IS
 12 SAYING AS FAR AS THE PUBLIC SAFETY MATTER.
 13 AND AGAIN, WE BROUGHT UP THE ISSUE OF NEW ORLEANS, AND THERE
 14 ARE ACTUALLY THINGS THAT COULD HAVE BEEN DONE TO THE LEVEES
 15 THAT WOULD HAVE MADE A HUGE DIFFERENCE. THIS IS NOT WHAT WE'RE
 16 TALKING
 17 ABOUT HERE.
 18 **FRANK ROLLO:** MADAM PRESIDENT, FRANK ROLLO. IF WE COULD JUST
 19 COME BACK TO THIS SLIDE, PLEASE. I PERHAPS CONFUSED YOU.
 20 THERE ARE TWO WALLS. THE SEAWALLS, THE FAIR'S SEAWALL IS
 21 ACTUALLY CREATED OF EARTH. IT IS BASICALLY A DIKE. YES, IT
 22 WILL MOVE, IT MAY MOVE UP TO THREE FEET DURING A 1906
 23 EARTHQUAKE. BUT IT'S NOT GOING TO FAIL. IT WILL JUST GO FOR A
 24 RIDE. IT'S THOSE THINGS THAT ARE PLACED ON TOP OF IT THAT
 25 WOULD BE DAMAGED.

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1 OKAY. THE OTHER IS THE MARINA SEAWALL. AND IT IS, IN FACT, A
 2 STRUCTURE. IT IS A NINE FOOT HIGH CONCRETE WALL THAT IS
 3 SUPPORTED ON COMPOSITE TIMBER PILES EXCEPT FOR AN AREA RIGHT
 4 IN HERE. AND THAT PORTION IS ON SHALLOW FOUNDATION.
 5 IN 1989 THE MARINA BOULEVARD SEAWALL DID NOT MOVE. EXCEPT FOR
 6 THAT AREA THAT WAS ON SHALLOW FOUNDATION, AND IT MOVED BECAUSE
 7 IT WAS SITTING RIGHT ON THE LOOSE WEAK SAND. STRENGTHENING THE
 8 WALL BY ADDING MORE PILES, STRENGTHENING THE GROUND BETWEEN
 9 THE WALL AND THE PILE, AND THE SEWER WILL IMPROVE ITS
 10 PERFORMANCE. BUT WHEN YOU LOOK AT THE SCOPE OF THE POTENTIAL
 11 MOVEMENT OF THE SCOPE OF THE LIQUEFACTION WHICH AND LATERAL
 12 SPREADING THAT POTENTIALLY CAN OCCUR, THE RISK OF DAMAGE TO
 13 THAT WALL STILL EXISTS.
 14 ONE OF THE CONCLUSIONS THAT WE REACHED IS IT WILL - BECAUSE
 15 OF ITS LOCATION, IT IS A MATTER IF THE WALL FAILED, IT WOULD
 16 NOT DAMAGE ANYTHING IN THE MARINA. IT WOULD NOT DAMAGE THE
 17 SEWER, AND IT WOULD HAVE NO EFFECT ON THE DEVELOPMENT BEHIND.
 18 IT WOULD BE A MATTER OF REPLACING THE WALL AND REPAIRING THE
 19 WALL. THAT WAS THE CONCLUSION WE GAVE AS ONE OF THE OPTIONS TO
 20 THE CITY AND COUNTY OF SAN FRANCISCO IN 1997. A LOT OF
 21 REFERENCE WAS MADE TO
 22 THE 1991 REPORT. THIS IS THE REPORT. I WAS FORTUNATE ENOUGH TO
 23 SERVE ON IT. IT WAS ALSO REVIEWED BY PROFESSOR JIM MITCHELL OF
 24 THE UNIVERSITY OF CALIFORNIA, TOM HANKS WHO WAS THE HEAD OF
 25 THE U.S. GEOLOGIC SURVEY. A LOT OF HORSE POWER ON THIS THING.

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1 THE ESTIMATE THAT WAS MADE - I MADE THE ESTIMATE. THE \$350,000
2 WAS MADE IN FACT, TO STRENGTHEN THE WALLS. THAT NUMBER STILL
3 EXISTS. IT'S PROBABLY HIGHER NOW BECAUSE WE ALL KNOW WHAT'S
4 HAPPENED TO CONCRETE.

5 BUT THE CONCLUSION FROM THIS WAS TO GO OUT AND DO A MORE
6 EXTENSIVE STUDY. THAT WAS DONE. THE CONCLUSION IS, IF YOU'RE
7 STRENGTHENING THE SEAWALL TO IMPROVE THE STABILITY OF THE
8 LANDS BEHIND THE SEAWALL, YOU'RE KIDDING YOURSELF. THERE IS
9 TOO MUCH INERTIA, TOO MUCH MASS. IN FACT, IT IS JUST A
10 LOCALIZED WALL. AND IF IT FAILS, YOU REPAIR IT. THAT WAS
11 BASICALLY OUR CONCLUSION.

12 **COMMISSIONER SUE LEE:** THANK YOU.
13 **COMMISSIONER OLAGUE:** IF MS. GIRARDOT CAN RESPOND TO THAT. I'D
14 LIKE TO HEAR BOTH SIDES OF IT.

15 **JOAN GIRARDOT:** I'M NOT A GEOTECHNICAL PERSON.
16 **COMMISSIONER OLAGUE:** I REALIZE THAT.

17 **JOAN GIRARDOT:** I DID SERVE ON THAT COMMITTEE THAT HE
18 REFERRED TO. AND THAT TOM HANKS AND PROFESSOR JAMES MITCHELL
19 AND THE OTHER DIGNITARIES SAID THAT WAS THE REPORT THAT SAID
20 WE SHOULD STRENGTHEN THE SEAWALLS. I THINK HE GOT THAT MIXED
21 UP WITH THE 1997 REPORT WHERE HE WAS ON THE BLUE RIBBON PANEL
22 THAT WENT BACK AND REVIEWED WHAT THE PREVIOUS STUDIES HAD
23 SAID.

24 YOU ASKED A GOOD QUESTION. WHAT IS THE BENEFIT OF
25 STRENGTHENING THE SEAWALL. YOU KNOW, THE SEWER BOX ITSELF

1 WOULD BE HELPED. WE HAD ON THAT COMMITTEE THE DEPARTMENT OF
2 PUBLIC HEALTH BECAUSE THAT SEWER BOX COLLECTS THE SEWAGE FROM
3 THE ENTIRE NORTHERN SECTION, FROM PACIFIC HEIGHTS ALL THE WAY
4 DOWN, AND FROM THE PRESIDIO AND ROUTED AROUND THE EMBARCADERO.
5 AND IF THEY ARE NOW SAYING THAT WE ARE GOING TO RELY ON THE
6 SEWER BOX TO FULFILL THE GOAL OF PREVENTION OF LATERAL
7 SPREADING OF LIQUEFIED SOIL, THEN WE HAVE TO LOOK AT WHAT IF
8 THE SEWER BOX FAILED, WOULDNT IT BE NICE TO HAVE THE SEAWALL
9 SEISMICALLY STRENGTHENED TO ADD MORE PROTECTION FOR THE SEWER
10 BOX ITSELF.

11 **FRANK ROLLO:** AGAIN, IF I CAN CLARIFY SOMETHING, PLEASE.
12 FIRST OF ALL, I WAS A MEMBER OF THE 1991 PANEL; IT'S IN THE
13 REPORT. SECOND, WE TALK ABOUT THE BOX SEWER.

14 I'D LIKE TO PUT THIS DRAWING SO THAT YOU CAN GET A SENSE OF
15 SCALE. HERE IS THAT SEAWALL. HERE IS THE BOX SEWER. AS YOU CAN
16 SEE, THE BOX SEWER EXTENDS WELL BELOW THE BOTTOM OF THE WALL.
17 THANK YOU VERY MUCH. WELL BELOW THE BOTTOM OF THE WALL.
18 FAILURE OF THIS WALL DOES NOT AFFECT THE PERFORMANCE OF THIS
19 BOX BECAUSE THE FOUNDATION OF THAT WALL IS APPROXIMATELY 15
20 FEET HIGHER THAN THE BOTTOM OF THE BOX.

21 **COMMISSIONER OLAGUE:** SO WHAT WOULD THE FAILURE OF THE WALL
22 IMPACT?

23 **FRANK ROLLO:** ITSELF. IT WOULD FALL. IT WOULD EITHER CRACK
24 OR IT MIGHT OVER TURN, AND IT WOULD EFFECT THE PATHWAY.
25 **COMMISSIONER OLAGUE:** WOULD IT AFFECT THE EXISTING BUILDING

1 THAT IS TO BE USED AS A HARBOR OFFICE?
 2 **FRANK ROLLO:** THAT IS THE OTHER SEAWALL. THAT IS THE FAIR
 3 SEAWALL.
 4 **COMMISSIONER OLAGUE:** THE FAIR SEAWALL. I'M SORRY, YEAH.
 5 **FRANK ROLLO:** THAT IS NOT AT ISSUE HERE AS FAR AS
 6 STRENGTHENING. THERE HAS NEVER BEEN DISCUSSION AS FAR AS
 7 STRENGTHENING THIS WALL. THE STRENGTHENING OF THE MARINA
 8 SEAWALL. WHAT THE DISCUSSION WAS, IF YOU'RE GOING TO
 9 STRENGTHEN ANYTHING, YOU WOULD STRENGTHEN THE SOIL BEHIND THE
 10 FAIR SEAWALL.
 11 **COMMISSIONER OLAGUE:** OKAY SO THEN - I SEE WHAT YOU'RE
 12 SAYING. THE FAIR SEAWALL, IF THAT WERE THAT IS NOT BEING
 13 CONSIDERED FOR SEISMIC UPGRADE.
 14 **FRANK ROLLO:** NO, MA'AM.
 15 **COMMISSIONER OLAGUE:** SO IF THAT WERE TO FAIL, WOULD IT HAVE
 16 AN IMPACT ON THE HARBOR OFFICE?
 17 **FRANK ROLLO:** WELL, IT WOULD - NONE OF US BELIEVE- NONE OF
 18 THE PEOPLE THAT HAVE BEEN INVOLVED AND THERE HAVE BEEN
 19 NUMEROUS PEOPLE INVOLVED, NONE OF US BELIEVES THE FAIR'S
 20 SEAWALL WILL FAIL. WHAT WE BELIEVE WILL HAPPEN IS THAT IT WILL
 21 MOVE. IT COULD MOVE HORIZONTALLY UP TO THREE FEET. IF THERE IS
 22 A STRUCTURE ON THAT WALL AND IT WAS NOT PROPERLY DESIGNED, IT
 23 WILL, IN FACT, FAIL. IF IT IS PROPERLY DESIGNED, IT WILL GO
 24 FOR A RIDE, BASICALLY.

1 **COMMISSIONER OLAGUE:** THAT IS PART OF THE PROJECT, SO I
 2 ASSUME, THEN, IT WILL BE PROPERLY DESIGNED, RIGHT?
 3 **FRANK ROLLO:** I WILL LEAVE THAT TO MR. AGUNBIADE.
 4 **COMMISSIONER SUE LEE:** EXCUSE ME, I'M A LITTLE BIT FRUSTRATED
 5 HERE. THIS IS AN INFORMATIONAL HEARING. THE DEIR IS THE NEXT
 6 ITEM. WE HAVE A CALENDAR WITH FIVE OTHER CASES THAT WE HAVEN'T
 7 EVEN HEARD THAT WE ARE SUPPOSED TO ACT ON. THIS IS INFORMATION
 8 ONLY. I THINK THERE IS A LOT OF INTEREST. I THINK THERE IS A
 9 REC AND PARK COMMISSION WHERE THIS IS ALSO GOING TO BE HEARD.
 10 SO I WOULD JUST LIKE TO MOVE THIS FORWARD IF I CAN. MR.
 11 ANTONINI.
 12 **COMMISSIONER ANTONINI:** I'LL KEEP IT REAL BRIEF. I THINK AT
 13 THIS POINT WE'RE BASICALLY LOOKING AT - TO MAKE SURE THAT
 14 THESE ISSUES ARE ADDRESSED IN THE EIR. AND, YOU KNOW, IF WE
 15 ARE ADDRESSING THE ISSUE OF THE SEISMIC STRENGTHENING OF THE
 16 SEAWALL, WHETHER IT'S POSSIBLE HOW MUCH IT WOULD COST, WHAT
 17 COULD BE DONE, AND THAT'S REALLY WHAT HAS TO BE IN THERE
 18 WITHOUT MAKING ANY DECISION AS TO ADVISABILITY AND THE SAME IS
 19 TRUE WITH THE OTHER ISSUE I HEARD WHICH IS THE EFFECTS OF THE
 20 NEW BREAK WATER. THOSE ARE ADEQUATELY ADDRESSED. IF THEY
 21 AREN'T, THEN COMMENT SHOULD BE INCLUDED FOR THE FINAL EIR AS
 22 TO WHAT IS NOT SPOKEN TO THERE. I THINK SOME OF THE OTHER
 23 ISSUES THAT WERE RAISED ABOUT THE DIFFERENCE BETWEEN THE LARGE
 24 BERTHS AND THE SMALL (SIC), AGAIN, THE ENVIRONMENTAL IMPACT
 25 EFFECTS OF THESE DIFFERENT SIZE BERTHS IS SOMETHING THAT IS

1 APPROPRIATE HERE.
 2 AND WHETHER OR NOT ONE SMALLER BERTHS OR LARGER BERTHS OR
 3 WHAT ARE PART OF THE PROJECT, THEN, SHOULD BE CONSIDERED AT A
 4 LATER TIME. SO I THINK THAT THE IMPORTANT THING HERE IS THAT
 5 THE REPORT BE COMPLETE AND ADEQUATE.

6 **LAWRENCE BADINER:** COMMISSIONER, I DON'T WANT TO GET INTO
 7 LONG DISCUSSION. I KNOW WE'RE RUNNING LATE. COMMISSIONER
 8 ANTONINI DID SAY ONE THING THAT I THINK NEEDS TO BE CLARIFIED
 9 OR CORRECTED. I THINK YOU SAID THAT THE BENEFITS OF
 10 STRENGTHENING THE SEAWALLS WILL BE EXAMINED IN THE EIR. I WANT
 11 TO BE REALLY CLEAR. THAT IS NOT MY UNDERSTANDING.

12 THE PROJECT WHICH DOES NOT INCLUDE THOSE AND I THINK THERE IS
 13 A LOT OF DISCUSSION IN THIS INFORMATIONAL ITEM WHICH IS USEFUL
 14 ABOUT WHY IT'S IN THERE OR WHY IT'S NOT IN THERE, ET CETERA.
 15 IT IS A DISCUSSION ABOUT WHAT THE PROJECT IS. THE EIR IS GOING
 16 TO TAKE THE PROJECT AND EXAMINE THE ENVIRONMENTAL IMPACTS OF
 17 THAT PROJECT. THAT PROJECT DOES NOT INCLUDE THE SEAWALL. THIS
 18 DISCUSSION, THIS INFORMATIONAL DISCUSSION, I THINK IS HELPFUL
 19 TO WHY THAT PROJECT DOESN'T INCLUDE THE SEAWALL, THOUGH. I
 20 DON'T WANT A MISUNDERSTANDING OF WHAT THE EIR WILL COVER OR A
 21 MISEXPECTATION WHEN THE EIR FULLY COMES OUT. I HOPE THAT'S
 22 USEFUL. THANK YOU.

23 **COMMISSIONER SUE LEE:** COMMISSIONER BILL LEE
 24 **COMMISSIONER BILL LEE:** I GUESS MY FIRST QUESTION TO THE STAFF
 25 IS, THIS ISN'T THE FIRST PROJECT WHERE THERE ARE SEISMIC

1 ISSUES. AND TO BE CONSISTENT, WHEN WE DO DRAFT EIRS, THERE ARE
 2 A CERTAIN LEVEL OF DETAILS WHEN WE GET INTO IMPACT OF SEISMIC.
 3 THIS IS NOT ACTUALLY A PUBLIC HEARING, BUT I THINK WHEN YOU
 4 RESPOND TO THE PUBLIC, I WANT TO BE CONSISTENT THAT ALL THE
 5 EIRS WE DO, WE GO THROUGH CERTAIN LEVEL, WE SHOULD BE
 6 CONSISTENT. I DON'T KNOW WHAT THAT LEVEL IS.

7 I GUESS THE KEY ISSUE HERE, DOES THE SEAWALL - SHOULD THE
 8 SEAWALL ISSUE BE INCLUDED IN THIS EIR AND BASED ON THE SCOPE
 9 OF THIS PROJECT, FROM MY UNDERSTANDING, IT DOES NOT INCLUDE
 10 IT.
 11 AND BASED ON YOUR DISCUSSION. THE ISSUE IS, SHOULD IT BE
 12 INCLUDED BUT WHO SETS THAT POLICY I DON'T THINK IT'S THE
 13 PLANNING COMMISSION THAT SETS THAT POLICY. I THINK IT'S THE
 14 RESPONSIBILITY OF REC AND PARK COMMISSION TO SET THAT POLICY
 15 BECAUSE, FRANKLY, IT'S THEIR PROPERTY. IF THEY COME TO US AND
 16 THE NEIGHBORS HAVE TO UNDERSTAND THIS, WE'RE REVIEWING THE EIR
 17 SPECIFICALLY FOR THE MARINA PROJECT AND I DON'T THINK WE HAVE
 18 JURISDICTION TO TELL THE

19 REC AND PARK COMMISSION TO INCLUDE THE SEAWALL.
 20 AND SO I DON'T KNOW WE DON'T HAVE AN ATTORNEY HERE, HOW FAR
 21 ARE WE OVER REACHING. I STILL THINK WHEN WE DO THIS EIR TO
 22 RESPOND TO NEIGHBORHOOD PEOPLES COMMENTS, IT BETTER BE
 23 CONSISTENT IN REGARDS TO ALL THE OTHER EIRS THAT WE HAVE DONE.
 24 **LAWRENCE BADINER:** I WILL GUARANTEE YOU THAT THIS EIR WILL
 25 BE CONSISTENT WITH THE OTHER EIRS THAT WE HAVE DONE.

1 COMMISSIONER BILL LEE: THANK YOU.
2 COMMISSIONER SUE LEE: COMMISSIONER HUGHES.

3 COMMISSIONER HUGHES: JUST VERY QUICKLY, THE ENVIRONMENTAL
4 IMPACT REPORT WILL, WHETHER OR NOT SEAWALLS REMAIN AS IS, OR
5 WHETHER OR NOT THEY ARE REPLACED OR REBUILT, THE ENVIRONMENTAL
6 IMPACT REPORT IS GOING TO HAVE TO SPEAK TO THE POTENTIAL
7 ENVIRONMENTAL IMPACT IF WE HAVE A FINDING THAT IN ORDER FOR
8 THE EIR TO BE ADEQUATE AND ACCURATE AS IT RELATES TO POTENTIAL
9 ENVIRONMENTAL IMPACTS, IT HAS TO ADDRESS THOSE SEAWALLS AS
10 THEY RELATE TO THAT POTENTIAL FOR ENVIRONMENTAL IMPACT.

6.1

11 AND IF THERE IS A FINDING THAT IT HAS THE POTENTIAL TO HAVE
12 AN ENVIRONMENTAL IMPACT, THERE HAS TO BE MITIGATION IN THE
13 ENVIRONMENTAL IMPACT REPORT, I BELIEVE, FOR A FINDING OF
14 ADEQUATE AND ACCURATE AS AN ENVIRONMENTAL IMPACT REPORT IN THE
15 PROJECT. SO WHETHER OR NOT THE SEAWALLS STAY OR GO, THAT IS
16 YOU KNOW, THAT IS AN ITEM THAT IS NOT IN FRONT OF US AS IT
17 RELATES TO THE ENVIRONMENTAL IMPACT REPORT. BUT THE STUDY OF
18 THE POTENTIAL IMPACT OF WHATEVER DECISION THAT IS, HAS TO BE
19 ADDRESSED FULLY IN THE EIR. THANK YOU, MADAM PRESIDENT.

20 COMMISSIONER SUE LEE: I'M GOING TO LAY THIS OUT HERE BECAUSE
21 WE DO HAVE FIVE CASES WHERE WE ARE TO DELIBERATE. THE DRAFT
22 EIR HEARING IS SIMPLY THE COMMISSION SITTING TO LISTEN TO YOUR
23 COMMENTS. IT IS NOT SOMETHING THAT WE HAVE TO ACT ON. SO,
24 THESE ARE MY TWO OPTIONS AND I WOULD LIKE MY FELLOW
25 COMMISSIONERS TO HELP ME. WE CAN CALL THE NEXT ITEM, WHICH IS

1 A HEARING ON THE DRAFT EIR, AND I WOULD LIKE TO LIMIT THE
2 PUBLIC COMMENT TO A MINUTE BECAUSE PUBLIC COMMENT, THE PUBLIC
3 COMMENT PERIOD IS OPEN TILL THE 19TH. AND SO ANYONE WHO HAS
4 GOT COMMENTS CAN PROVIDE THEM IN WRITING. OR WE COULD SKIP
5 OVER THE HEARING ON THE DRAFT EIR AT THIS TIME AND GO DIRECTLY
6 TO THE DR CASES AND THE CONDITIONAL USE CASES SO THAT OUR
7 BRAINS ARE STILL WORKING WHILE SO WE CAN LISTEN TO WHAT PEOPLE
8 HAVE TO SAY ON THE DRS AND CONDITIONAL USES AND MOVE THE DRAFT
9 EIR HEARING TO THE END OF THE CALENDAR. WHAT IS YOUR DESIRE?

10 INAUDIBLE SPEAKER: (INAUDIBLE)

11 COMMISSIONER SUE LEE: SO HAS EVERYBODY ELSE. OUR BRAINS GET
12 FRIED AND WE DON'T DO JUSTICE TO THOSE PEOPLE WHO ARE GOING TO
13 RELY ON OUR DECISIONS ON THEIR CASES, ALL RIGHT. THAT IS THE
14 WAY I FEEL.

15 THE PUBLIC COMMENT ON THE DRAFT EIR IS OPEN UNTIL JANUARY
16 19TH. THEY CAN ACCEPT WRITTEN COMMENTS. IT IS NOT NECESSARY TO
17 GET UP TO THE PODIUM AND SPEAK FOR YOUR COMMENTS TO BE
18 INCLUDED FOR THE DRAFT EIR. THAT IS MY POINT.

19 LAWRENCE BADINER: JUST SO YOU KNOW, I THOUGHT THIS WAS
20 GOING FOR AWHILE. I INSTRUCTED STAFF THAT I WILL BE PRESENTING
21 ALL OF THESE ITEMS. SO IF YOU ASK ANY REALLY TOUGH QUESTIONS,
22 I'M GOING TO LOOK MORE FOOLISH THAN I NORMALLY DO.

23 MY ESTIMATION IS THAT YOU HAVE, IN THE CASE OF NUMBER 19,
24 THAT IS A CASE WITH SOME CONTROVERSY BACK AND FORTH. IN THE
25 CASE OF 3011 STEINER STREET, THIS IS ALL MY ESTIMATION. SO IF

1 I MISPEAK AND SOMEONE IS HERE REALLY OPPOSED TO SOMETHING,
 2 PLEASE DON'T TAKE IT AS A SLIGHT OR THAT I'M IGNORING YOU.
 3 MY UNDERSTANDING IS THE ISSUES ON 30 10 - 3011 STEINER ARE
 4 FAIRLY DEFINED. THERE ARE SOME NEIGHBORHOOD CONCERNS, BUT THEY
 5 ARE FAIRLY WELL DEFINED. MY UNDERSTANDING OF 83 POPE STREET
 6 THERE ARE NO PLANNING ISSUES INVOLVED. MY UNDERSTANDING OF
 7 JERSEY STREET IS THERE PROBABLY AREN'T A LOT OF NEIGHBORS
 8 INVOLVED IN THE DWELLING UNIT MERGER. I HAVE SOME COMMENTS, I
 9 THINK OUR BASIS ULTIMATELY, RECOMMENDATION WAS ULTIMATELY
 10 CORRECT. BUT THE WAY IT WENT TO THAT RECOMMENDATION, I AM
 11 GOING TO MAKE SOME COMMENTS ON. AND I BELIEVE, ALTHOUGH I'M
 12 NOT CERTAIN, ITEM NUMBER 25, THE CASTRO STREET ONE, I THINK
 13 AGAIN - I DON'T THINK THERE IS A LOT OF NEIGHBORS INVOLVED IN
 14 THAT, BUT I'M NOT POSITIVE ON THAT. I THINK THAT IS SOLELY
 15 BETWEEN STAFF AND THE PROJECT SPONSOR, PRETTY MUCH. SO THAT
 16 GIVES YOU A FLAVOR OF WHAT YOU HAVE BEFORE YOU.
 17 **COMMISSIONER SUE LEE:** COMMISSIONER ANTONINI.
 18 **COMMISSIONER ANTONINI:** I THINK PROBABLY I WOULD BE IN FAVOR
 19 OF TRYING TO COMPLETE THE COMMENT ON THE EIR AT THIS TIME AS
 20 OPPOSED TO PUTTING IT AT THE END BECAUSE THERE ARE A LOT OF
 21 PEOPLE HERE AND I WOULD THINK THE VAST MAJORITY OF THEM ARE
 22 HERE TO COMMENT ON THE EIR. BUT, I WOULD ASK THAT EVERYONE
 23 ADDRESS BASICALLY THE ADEQUACY OF THE REPORT, IS THERE AN
 24 ENVIRONMENTAL CONCERN THAT IS NOT ADDRESSED, MENTION IT, AND
 25 THEN THERE IS TIME FOR IT TO BE INCLUDED AS PART OF THE

1 REPORT. THAT IS WHY THIS IS A PRELIMINARY DEIR TYPE SITUATION.
 2 I MEAN, AS FAR AS THE ADVISABILITY OF WHETHER YOU HAVE LARGE
 3 BERTHS OR SMALL BERTHS, I DON'T REALLY THINK THAT IS
 4 APPROPRIATE UNLESS THERE IS ENVIRONMENTAL IMPACT. SO THAT
 5 WOULD BE WHAT I WOULD SUGGEST, TO GET THROUGH IT.
 6 **COMMISSIONER BILL LEE:** I SUGGEST WE CONTINUE.
 7 **COMMISSIONER SUE LEE:** ALL RIGHT. CALL THE NEXT ITEM.
 8
 9 ~ ITEM 18 ~
 10
 11 **LINDA AVERY:** ITEM NUMBER 18, CASE NO. 2002.1129E, SAN
 12 FRANCISCO MARINA RENOVATION PROJECT. THE PUBLIC HEARING ON THE
 13 DRAFT FOR THE CONTINUATION OF THE PUBLIC HEARING ON THE DRAFT
 14 ENVIRONMENTAL IMPACT REPORT.
 15 **LAWRENCE BADINER:** BEFORE YOU BEGIN, IF I MIGHT ASK THE
 16 PUBLIC WHEN WE GO THROUGH THIS, PLEASE BE MINDFUL OF COMMENTS
 17 THAT WERE EITHER MADE IN WRITING, THAT WERE MADE AT THE
 18 PREVIOUS HEARING, OR THAT HAVE BEEN MADE BY SOMEONE ELSE
 19 ALREADY AT THIS HEARING AS WE GO THROUGH. WE DON'T NEED A
 20 REPETITION OF THE POINTS. I AM ALSO GOING TO BE PRETTY ADAMANT
 21 IF I START HEARING THINGS THAT ARE NOT RELATED TO THE
 22 ENVIRONMENTAL REVIEW, I WILL SPEAK UP. AND, COMMISSIONERS, IF
 23 YOU FEEL IT APPROPRIATE, PLEASE TELL ME.
 24 **LISA GIBSON:** GOOD EVENING, PRESIDENT LEE, MEMBERS OF THE
 25 COMMISSIONER. I AM LISA GIBSON PLANNING DEPARTMENT STAFF. AS

1 YOU KNOW THIS IS A HEARING ON THE DRAFT EIR FOR THE SAN
 2 FRANCISCO MARINA RENOVATION PROJECT. THE SECOND HEARING ON THE
 3 DRAFT EIR WAS OCTOBER 6. WE ARE HAVING THE SECOND HEARING AT
 4 THE REQUEST OF THE COMMISSION.
 5 WE HEARD A BUNCH OF COMMENTS TODAY ON OCTOBER 6. I'M NOT
 6 GOING TO REPEAT ALL OF THOSE. I DID WANT TO ADDRESS A FEW
 7 ITEMS THAT THE COMMISSION RAISED AT LEAST ONE ITEM. ONE WAS
 8 THAT THE LANDMARKS PRESERVATION ADVISORY BOARD COMMENT ON THE
 9 HISTORIC IMPACTS OF THE PROJECT. AND I JUST WANTED YOU TO KNOW
 10 THAT THE LANDMARKS BOARD DID HAVE A HEARING ON THIS PROJECT ON
 11 OCTOBER 5TH, THE DAY BEFORE THE DRAFT EIR HEARING. THEY HAD AN
 12 INFORMATIONAL PRESENTATION BY THE PROJECT SPONSOR AND THEY
 13 ALSO HAD A HEARING ON THE DRAFT EIR TO ALLOW THEM TO FORMULATE
 14 THEIR COMMENTS ON IT. THEY INDICATED THEY WILL BE SUBMITTING
 15 COMMENTS ON THE DRAFT EIR SPECIFICALLY PERTAINING TO THE
 16 HISTORIC IMPACTS OF THE PROJECT.
 17 AS YOU KNOW, YOU'VE EXTENDED THE PUBLIC REVIEW PERIOD IN
 18 RESPONSE TO REQUESTS THAT WE HEARD FROM THE COMMISSION. THE
 19 COMMENTS PERIOD IS EXTENDED TO JANUARY 19, 2006. ALL COMMENTS
 20 THAT ADDRESS THE ADEQUACY AND ACCURACY OF THE EIR WILL BE
 21 ADDRESSED AND I WANT YOU TO KNOW THAT IT WAS OUR INTENTION TO
 22 SEPARATE THE INFORMATIONAL PRESENTATION FROM THE DRAFT EIR
 23 HEARINGS, SO THAT WE COULD HEAR COMMENTS ONLY ON THE EIR AT
 24 THIS TIME. WE DID HEAR SOME COMMENTS ON THE EIR IN THE
 25 PREVIOUS ITEM AND WE WILL BE REVIEWING THE TRANSCRIPT FOR THAT

1 ITEM SO THAT WE CAN ENSURE THAT ANY COMMENTS THAT WE'RE
 2 ADDRESSING NEW TOPICS WILL BE RESPONDED TO IN OUR WRITTEN
 3 RESPONSES TO COMMENTS DOCUMENT, WHICH WILL BE COMING OUT AFTER
 4 THE PUBLIC REVIEW PERIOD. SO WE WILL NOT BE IGNORING ANY
 5 COMMENTS THAT ARE RELEVANT TO THE ENVIRONMENTAL IMPACT REPORT.
 6 PLEASE, COMMENTERS, SPEAK SLOWLY AND CLEARLY SO THAT THE
 7 COURT REPORTER CAN PRODUCE AN ACCURATE TRANSCRIPT. PLEASE
 8 STATE YOUR NAME AND ADDRESS SO THAT YOU CAN BE PROPERLY
 9 IDENTIFIED WHEN WE PUBLISH THE COMMENTS AND RESPONSES
 10 DOCUMENT, WE WANT TO BE ABLE TO SEND YOU A COPY. THAT
 11 CONCLUDES MY PRESENTATION ON THIS MATTER UNLESS THE COMMISSION
 12 HAS ANY QUESTIONS.
 13 **COMMISSIONER SUE LEE:** THANK YOU. ALL RIGHT. PUBLIC COMMENT
 14 IS OPEN AND WE ARE GOING TO LIMIT IT TO A MINUTE EACH. RON
 15 MULCARE THEN MICHAEL SPIEGEL.
 16 **RON MULCARE:** THANK YOU, I'M RON MULCARE AND I'VE ALREADY
 17 GIVEN MY ADDRESS THERE, 655 MARINA BOULEVARD.
 18 I POINT OUT TO YOU AS I DID BEFORE THAT I'M A MEMBER OF THE
 19 MARINA COMMUNITY ASSOCIATION, AT LEAST HALF OF HOUR PEOPLE
 20 HAVE LEFT BECAUSE THEY HAD OBLIGATION TO PICK UP CHILDREN AND
 21 THINGS OF THAT NATURE. I ALSO SUBMITTED A LETTER SEPTEMBER
 22 27TH, 2005, WHICH IS PART OF THE RECORD IN THIS MATTER AND I
 23 THINK YOU HAD IT BEFORE YOU AT THE FIRST HEARING.
 24 UNFORTUNATELY, I WASN'T HERE BECAUSE I WAS ILL THAT DAY.
 25 AS TO AN ECONOMIC ISSUE, AN ECONOMIC SOCIO-ECONOMIC ISSUES

1 ARE PART OF THE EIR, IT HAS BEEN ACKNOWLEDGED BY YOMI THAT
 2 BOATS AND WATERWAYS DOES FUND UPLAND IMPROVEMENTS AND THAT
 3 WOULD INCLUDE SOMETHING LIKE THE IMPROVEMENT OF THE SEAWALL.
 4 FURTHER, IF THE REC AND PARK HAS NOT BEEN ABLE TO MAINTAIN
 5 THIS FACILITY IN OTHER WORDS, THEY SAY THEY'VE GOT 40 YEARS OF
 6 DEFERRED MAINTENANCE, HOW ARE THEY GOING TO DO IT IN THE
 7 FUTURE. THAT'S THREE MINUTES?
 8 **COMMISSIONER SUE LEE:** A MINUTE. ONE MINUTE.

2.1
cont

9 **RON MULCARE:** OKAY. I'LL SUMMARIZE BY SAYING THE EIR ITSELF
 10 CONTINUALLY SAYS THEY ARE GOING TO STUDY IN THE FUTURE AND
 11 REPORT IN THE FUTURE AND DESIGN IN THE FUTURE AND CONSTRUCT IN
 12 THE FUTURE. THAT INCLUDES DAMAGE.
 13 **COMMISSIONER SUE LEE:** THANK YOU VERY MUCH. NEXT SPEAKER.
 14 **LINDA AVERY:** THE PRESIDENT IS NOT ALLOWING SUMMARIZATION.
 15 THE PRESIDENT HAS ALLOWED ONE MINUTE FOR TESTIMONY, NOT ONE
 16 MINUTE FOR TESTIMONY, AND THEN 30 SECONDS FOR SUMMARIZATION.
 17 ONE MINUTE.

2.4

18 **COMMISSIONER SUE LEE:** THANK YOU. MICHAEL SPIEGEL.
 19 **MICHAEL SPIEGEL:** MICHAEL SPIEGEL. I WANT IT RAISE A POINT
 20 THAT THE DRAFT EIR AS TO THIS THOUSAND FOOT MAINTENANCE
 21 BUILDING DOESN'T CONSIDER ANY ALTERNATIVE. IT IS MY
 22 UNDERSTANDING THAT AN EIR IS SUPPOSED TO CONSIDER
 23 ALTERNATIVES. THE MAJOR ALTERNATIVE NOT CONSIDERED IS THAT
 24 THIS THING CAN BE LOCATED SOMEWHERE ELSE OTHER THAN RIGHT
 25 THERE IN THE MIDDLE OF THIS EAST MARINA GREEN. THAT'S OPEN

10.4

1 SPACE. AND THE PARTICULAR PLACE THAT I WOULD RECOMMEND THAT IT
 2 BE CONSIDERED FOR LOCATION IS THE NORTHWEST CORNER OF THE
 3 SMALL MARINA GREEN, OVER BY THE FORMER P.U.C. SEWER PLANT, THE
 4 BUILDING THAT IS CURRENTLY BEING USED RIGHT ACROSS FROM THAT
 5 CURRENT USE BUILDING, THERE IS A SMALL MARINA GREEN, AND THAT
 6 CORNER RIGHT THERE IS NOT USED FOR VOLLEYBALL OR FOR ANYTHING
 7 ELSE. AND IT HAS ADEQUATE PARKING FOR THE REC AND PARK TRUCKS
 8 AND OTHER EQUIPMENT.

9 **COMMISSIONER SUE LEE:** ALL RIGHT. ALAN SILVERMAN, LAVERNE
 10 CISCO (PHONETIC). NANCY NICHOLS.
 11 **ALAN SILVERMAN:** I AM ALAN SILVERMAN. I'LL STICK TO THE EIR.
 12 I'D LIKE TO REFER YOU TO PAGE ROMAN NUMERAL 3B-9. THAT IS A
 13 PICTURE OF THE TOP, IS VIEW FROM MY HOUSE. THE BOTTOM IS THE
 14 VIEW FROM MY HOUSE AFTER THE MAINTENANCE BUILDING IS PUT UP.
 15 THE COMMENT IN THE EIR IS THAT IT REALLY DOESN'T AFFECT THE
 16 VIEW BECAUSE THE VIEW IS OBSTRUCTED BY TREES ANYHOW. NOW, I'M
 17 NOT QUITE SURE HOW ENVIRONMENTALLY TREES LOOK THE SAME AS A
 18 BUILDING. AS REGARDS THIS BUILDING, AGAIN, I'LL QUOTE FROM THE
 19 EIR, IT SAYS SPECIFICALLY WITH THE CONSTRUCTION OF THE NEW
 20 MAINTENANCE BUILDING, FOR MATERIAL STORAGE, THE RECREATION AND
 21 PARKS DEPARTMENT WOULD NO LONGER USE THE 1500 SQUARE FOOT
 22 SFUC PUMP STATION AND IT WOULD REMAIN UNOCCUPIED. SO THEY'RE
 23 GOING TO PUT THAT UP IN THE MIDDLE OF THE MARINA GREEN AND
 24 LEAVE THE OTHER BUILDING UNOCCUPIED. THANK YOU.

4.3

2.5

25 **COMMISSIONER SUE LEE:** LAVERNE CISCO (PHONETIC). NANCY

1 NICHOLS. ERIN ROACH (PHONETIC). MICHAEL ALEXANDER. THEN
2 MAUREEN GAFFNEY.

3 **MICHAEL ALEXANDER:** COMMISSIONERS, MY NAME IS MICHAEL
4 ALEXANDER, A MEMBER OF THE BOARD OF SAN FRANCISCO BEAUTIFUL.
5 I'M SPEAKING FOR THE ORGANIZATION. WE WILL ADDRESS PUBLIC
6 ACCESS ISSUES ONLY, NOT MARITIME ISSUES. THE BAY TRAIL RUNS
7 COMPLETELY
8 THROUGH THIS PROJECT THROUGH THE EAST HARBOR ALONG ON THE
9 FAIR'S SEAWALL AUXILIARY ALONG MARINA BOULEVARD AND ALONG THE
10 MARINA SEAWALL.

11 THE DEIR IS DEFICIENT AND INADEQUATE IN THAT IT DOESN'T
12 IDENTIFY THE BAY TRAIL ALONG OR EVEN WITHIN THE PROJECT
13 BOUNDARIES. IT DOESN'T IDENTIFY PROJECTS ON THE IMPACTS OF THE
14 PROJECT ON THE BAY TRAIL. IT DOESN'T ANALYZE THOSE IMPACTS AND
15 IT DOESN'T IDENTIFY MITIGATIONS TO THOSE IMPACTS. LET ME SHOW
16 YOU THE CONDITIONS FOR THE PUBLIC ON THE TRAIL. IT'S USED BY
17 LITERALLY THOUSANDS OF PEOPLE. THERE ARE MANY CONFLICTS
18 ALREADY. PEOPLE ARE FORCED TO RIDE - OKAY.

19 **COMMISSIONER SUE LEE:** THANK YOU. MAUREEN GAFFNEY, SUE CHANG.
20 **MAUREEN GAFFNEY:** GOOD EVENING, COMMISSIONERS, MY NAME IS
21 MAUREEN GAFFNEY AND I'M WITH THE ASSOCIATION OF BAY AREA
22 GOVERNMENTS AND WORK ON THE SAN FRANCISCO BAY TRAIL PROJECT.
23 I'D LIKE TO SAY THE EIR DOES NOT ADDRESS THE BAY TRAIL
24 PROJECT. SPECIFICALLY, BOAT TRAILER PARKING ON TOP OF OUR
25 ALIGNMENT IN THE EAST HARBOR. REACTIVATION OF THE BOAT HOIST

1 IN THE EAST HARBOR AREA WILL IMPACT TRAIL USERS. THE
2 MAINTENANCE BUILDING IN THE EAST HARBOR AREA WILL BLOCK VIEWS
4.3

3 FROM THE TRAIL TO THE BAY. THE EXISTING 12 FOOT PATH ON THE
4 MARINA GREEN IN THE WEST HARBOR AREA IS INSUFFICIENT FOR THE
5 INTENSITY OF THE CURRENT USE, NOT TO MENTION USES GOING
6 FORWARD. CONCRETE CURVES THAT SEPARATE THE DRIVING AND PARKING
7 AREA FOR PRIVATE BOAT OWNERS CREATE A TRIP AND CRASH HAZARD IN
9.1
8 THE AREA. AND BAY TRAIL BELIEVES THAT PRIVATE BOAT OWNER
9 PARKING AND THE DRIVING LANE ARE NOT THE HIGHEST AND BEST USE
10 OF THE WATERFRONT IN THIS AREA. AND WE HAVE ASKED THAT THE EIR
11 WOULD ADDRESS THE BAY TRAIL PLAN AND POLICIES IN THE FINAL EIR
12 AND WORK ON SOME MITIGATION FOR THE TRAIL. THANK YOU.

13 **COMMISSIONER SUE LEE:** THANK YOU.

14 **SUE CHANG:** HI, I'M SUE CHANG, MARINA COMMUNITY ASSOCIATION.
15 MY ADDRESS IS NOW ON FILE.

16 THIS IS THE SOUTH STREET MOLE. I SPOKE ON THIS AT THE LAST
17 HEARING, BUT I WANTED TO BRING UP ANOTHER POINT. MY
18 UNDERSTANDING, THE SCOTT STREET USED TO GO STRAIGHT THROUGH TO
5.9
19 THE GOLDEN GATE YACHT CLUB AND I RESPECTFULLY REQUEST THAT
20 THERE BE A REVIEW FOR THE HISTORIC SIGNIFICANCE OF THIS MOLE.

21 THE DRAFT EIR BASICALLY SAYS THAT THIS MOLE IS USED FOR SPORT
3.4
22 FISHING AND THAT THOSE FISHERMEN CAN GO ALONG THE SEAWALL. I
23 DON'T BELIEVE THAT TO BE ACCURATE. IT IS A WONDERFUL PUBLIC
24 ASSET THAT'S GOT HISTORIC VIEWS OF THE HARBOR AND GOLDEN GATE
25 BRIDGE. IT IS WONDERFUL FOR SENIORS AND PEOPLE THAT AREN'T

1 GOING TO WANT TO GO DOWN THE GATEWAY ONTO A FLOATING DOCK.
 2 SECONDLY, JUST IN REGARD TO THE MAINTENANCE BUILDING BUT NOT
 3 THE SAME ISSUE MY NEIGHBORS HAVE BROUGHT UP, THIS IS WHAT THE
 4 EXISTING P.U.C. BUILDING LOOKS LIKE.
 5 THE BUILDING HERE, THIS IS THE KIND OF CRUD THEY STORE
 6 OUTSIDE OF IT. THE PHOTO SIMULATION ISN'T ACCURATE. THERE IS
 7 AN OLD BOAT GATE THERE. THERE IS NEW DOCKS THAT THEY'RE
 8 WORKING ON. I THINK A PHOTO SIMULATION SHOULD BE REDONE. THANK
 9 YOU.
 10 **COMMISSIONER SUE LEE:** JOAN GIRARDOT, NATHANIEL BERKOWITZ AND
 11 THEN DICK ROBINSON.
 12 **JOAN GIRARDOT:** JOAN GIRARDOT, MARINA CIVIC IMPROVEMENT
 13 ASSOCIATION. THE PROJECT DESCRIPTION IS INCOMPLETE AND
 14 INACCURATE. IT FAILS TO STATE THAT 3,335 LINEAR FEET OF DOCKS
 15 WILL BE ADDED AND THE PROJECT DELETES 282 BERTHS FOR SMALL
 16 BOATS. THE QUANTITY AND VOLUME OF BAY SAIL IS DEFINED BY
 17 BCDC. ANYTHING UNDER WATER, OVER THE WATER OR UNDER THE WATER
 18 IS INACCURATE AND INCOMPLETELY CALCULATED. THE VOLUMES STATED
 19 ARE NOT CERTIFIED FOR ACCURACY BY ANY OFFICIAL INDEPENDENT
 20 AGENCY.
 21 THIRDLY, RESTRIPIING OF THE PARKING LOTS IS NOT DEFINED,
 22 ADDING PARKING WOULD BE AGAINST THE CITY'S GENERAL PLAN, WHICH
 23 STATES THAT LAND USES WHICH CAN BE LOCATED OTHER THAN ON THE
 24 SHORELINE SHOULD BE.
 25 NEXT, THE FINAL DESIGN AND PROJECT COMPONENTS HAVE NOT BEEN

4.4

2.7

9.8

1 PRESENTED. WE CANNOT DETERMINE ENVIRONMENTAL IMPACTS OR
 2 EFFECTS OF PROJECT COMPONENTS WITHOUT FINAL DESIGN. AND
 3 LASTLY, THE - THANK YOU.
 4 **COMMISSIONER SUE LEE:** THANK YOU.
 5 **NATHANIEL BERKOWITZ:** I'M NATHANIEL BERKOWITZ. AND AGAIN I
 6 WANT TO SPEAK TO THE FACT THAT THE WATER CHANGE AND WATER
 7 QUALITY WITHIN THE HARBOR ITSELF IS VERY POOR AND VERY DIRTY.
 8 IT TAKES A NUMBER OF DAYS FOR THE WATER TO COMPLETELY CHANGE.
 9 THE SOLUTION TO THIS PROBLEM IS AVAILABLE TO US AND SHOULD BE
 10 INVESTIGATED WITH AN OUTLET AT THE WEST END OF THE EXISTING
 11 HARBOR. THANK YOU VERY MUCH.

7.1

12 **COMMISSIONER SUE LEE:** DICK ROBINSON.
 13 **GLORIA FONTANELLO:** FONTANELLO AGAIN. LET'S NOT LOOK BACK
 14 AND SAY WE MADE A BIG MISTAKE AND SPENT A LOT OF TAXPAYER
 15 DOLLARS WHEN WE HAD THE ALTERNATIVE OF REPAIR AND REPLACE. IF
 16 WE CAN ALL THINK FOR A MINUTE, THE SMALL MARINA GREEN WHERE
 17 THE GENTLEMAN WAS REFERRING TO IS A SANDY AREA. AND ABOUT TWO
 18 TO \$300,000 WAS SPENT OF ADA MONEY BECAUSE THEY WANTED ACCESS
 19 DOWN THERE. IF YOU NOTICE THE WOOD THAT GOES INTO THE SAND
 20 DOWN THERE, AND WE'VE WATCHED THAT NO ONE HAS BEEN ABLE TO USE
 21 THAT. THAT WAS A LOT OF MONEY SPENT. AND WE COULD HAVE GIVEN
 22 BETTER ACCESS FOR ADA. AND JUST LIKE THE BATHROOMS, I'M SURE
 23 THE CITY CAN COME UP WITH A MEMORANDUM OF UNDERSTANDING WITH
 24 THE P.U.C. TO CONTINUE THAT MAINTENANCE BUILDING WHERE IT IS.
 25 AND AGAIN, GO AFTER THE ADA MONEY TO UPGRADE ALL THE BATHROOMS

10.1

2.5

1 THAT ARE THERE AND WE'LL SAVE THE PEOPLE. THIS PROJECT COULD
 2 BE DONE FOR 6 MILLION, NOT 40 MILLION. THANK YOU.
 3 **COMMISSIONER SUE LEE:** NEXT SPEAKER, PLEASE.
 4 **DICK ROBINSON:** THANK YOU, COMMISSIONERS. DICK ROBINSON,
 5 HOMEOWNER, BOAT OWNER AND SLIP HOLDER. BACK IN OCTOBER I HAD
 6 WRITTEN A LETTER EXPRESSING SOME CONCERN OVER THE REDUCTION IN
 7 THE TURNING BASIN RADIUS AS A RESULT OF THE EXTENSION OF
 8 ADDITIONAL SLIPS. I HAVE SINCE MET WITH THE HARBOR MASTER,
 9 UNDERSTAND THE SCOPE OF THE PROJECT A LITTLE BIT BETTER NOW.
 10 DO NOT BELIEVE THAT THERE WILL BE ANY NEGATIVE IMPACT ON THE
 11 SAILING OPERATION OR PEOPLE COMING IN AND OUT OF THE HARBOR.
 12 SO I WISH TO WITHDRAW MY LETTER AS AN OBJECTION AT ALL. THANK
 13 YOU.

14 **COMMISSIONER SUE LEE:** NEXT SPEAKER.
 15 **EMERIC KALMAN:** MY NAME IS EMERIC KALMAN. WE HAVE THE
 16 HEARING TODAY. WE HAVE 650 USERS OF THE MARINA. THEY DON'T
 17 HAVE THE BENEFIT TO FOLLOW WHAT HAPPENED HERE. AND WE NEED
 18 MORE TIME. NOT ONLY THAT, REC AND PARK HAS A LETTER TO THE
 19 COMMISSION, I THINK IT WAS WRITTEN NOVEMBER 8 - NOVEMBER 10,
 20 AND ASKED FOR THE POSTPONEMENT OF THESE TWO HEARINGS. AND WE
 21 DON'T PRODUCE ANYTHING IN WRITING. I WENT TO THE DOCUMENTATION
 22 FILE, BUT NOTHING IN WRITING. EVERYTHING IS A BLAH BLAH HERE.
 23 AND LIKE I SAY, IT'S 650 USERS WHO PAY FOR IT, AND THEY ARE
 24 ENTITLED TO KNOW WHAT IS GOING ON. THE PROCESS IS BROKEN.
 25 THERE ARE SOME STATE LAWS ALSO, NOT ONLY CITY LAWS. THANK YOU.

1 **COMMISSIONER SUE LEE:** THANK YOU. NEXT SPEAKER, PLEASE. IS
 2 THERE ANYONE ELSE WHO WISHES TO MAKE A PUBLIC COMMENT AT THIS
 3 TIME? SEEING NONE, PUBLIC COMMENT IS CLOSED. BUT NOT
 4 PERMANENTLY. COMMENTS ARE WELCOME TILL 5 O'CLOCK ON JANUARY
 5 19TH. ALL RIGHT. AND I TRUST THAT ALL OF YOU ARE SUBMITTING
 6 YOUR COMMENTS IN WRITING. ALL RIGHT, THANK YOU VERY MUCH.
 7 WE'LL MOVE ON.
 8

9 (WHEREUPON ITEMS NUMBER 17 & 18 WERE CONCLUDED)

**ATTACHMENT 3: DRAFT POST PROJECT BERTH MOVEMENT POLICY
(AUGUST 2006)**

Draft Post Project Berth Movement Policy

San Francisco Marina

San Francisco Department of Recreation and Parks
August, 2006

Tenants will be assigned to berths as close to their pre-construction location as possible.

In the event of a location conflict, the tenant with the earliest contract date will receive priority of location selection of an appropriately sized berth for his vessel in the same general location.

Marina tenants will have the choice to move into larger berths at the completion of the Marina Renovation Project as space allows, and with the Harbormaster's approval.

Tenants who are relocated by the harbor staff, into berths larger than their vessel, will have the option of paying for the length of their vessel instead of the berth length as long as they meet the following criteria.

- The vessel is the original vessel assigned to the berth at the inception of the berth agreement.
- The vessel is the appropriate size for the original berth or smaller.
- The vessel is in seaworthy condition and good repair.
- Tenant maintains all accounts current and in good standing.

This policy will remain in effect for the original berth holder only. If there is a change in vessel, vessel ownership, sale of the vessel or violations of the Rules and Regulations, the berth holder will be required to pay for the length of the vessel or the length of the berth, whichever is greater.

● **CHAPTER IX**

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● CHAPTER X

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- **CHAPTER XI**

APPENDICES

APPENDIX A

NOTICE OF PREPARATION AND INITIAL STUDY

PLANNING DEPARTMENT

City and County of San Francisco • 1660 Mission Street, Suite 500 • San Francisco, California • 94103-2414



MAIN NUMBER (415) 558-6378	DIRECTOR'S OFFICE PHONE: 558-6411 4TH FLOOR FAX: 558-6426	ZONING ADMINISTRATOR PHONE: 558-6350 5TH FLOOR FAX: 558-6409	PLANNING INFORMATION PHONE: 558-6377 MAJOR ENVIRONMENTAL FAX: 558-5991	COMMISSION CALENDAR INFO: 558-6422 INTERNET WEB SITE WWW.SFGOV.ORG/PLANNING
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March 19, 2005

To Responsible Agencies, Trustee Agencies, and Interested Parties:

**RE: CASE NO. 2002.1129E—SAN FRANCISCO MARINA RENOVATION
NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT**

A Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the above-referenced project (State Clearinghouse No. 2003122131), described below, has been issued by the Planning Department. An Initial Study has also been prepared to provide more detailed information regarding the proposed project and the environmental issues to be considered in the Draft EIR. The NOP/Initial Study is either attached or is available upon request from **Lisa Gibson**, who you may reach at **(415) 558-5993** or in writing at the above address. The NOP/Initial Study is also available on-line at www.sfmarina.org. This notice is being sent to you because you have been identified as potentially having an interest in the project or the project area.

The proposed project is the renovation of the San Francisco Marina, (3950 Scott Street; Assessor's Block 900, Lot 003) including improvements to water-side and land-side facilities, and the addition of a 1,000-square-foot maintenance building. Water-side improvements would include installation of three new breakwater structures and the removal of two existing breakwater structures; reconstruction of portions of the degraded rip-rap slopes around the interior shorelines of the marina and along the outer seawall (between the St. Francis and Golden Gate Yacht Clubs); maintenance dredging; replacement and reconfiguration of the floating docks and slips; replacement of gangways and security gates; installation of an oily water and sewage pumpout facility and refurbishment of two sewage pumpout facilities; upgrade of electrical and water services to the new floating docks; and improved lighting on the docks. Land-side improvements would include renovation of marina restroom, shower, and office buildings; conversion of a vacant building (former Navy Degaussing Station) into office space; construction of a new maintenance building; and restriping of existing parking lots. The project site is within a P (Public) Use District and an OS (Open Space) Height and Bulk District.

The proposed project was the subject of a Preliminary Mitigated Negative Declaration (PMND) published by the Planning Department on December 27, 2003. Following receipt of several appeals to the PMND, the Department decided to prepare an Environmental Impact Report (EIR) prior to any final decision regarding whether to approve the project. The purpose of the EIR is to provide information about potential significant physical environmental effects of the proposed project, to identify possible ways to minimize the significant effects, and to describe and analyze possible alternatives to the proposed project. Preparation of an NOP or EIR does not indicate a decision by the City to approve or to disapprove the project. However, prior to making any such decision, the decision makers must review and consider the information contained in the EIR. Changes between the project analyzed in the PMND and the project to be analyzed in the EIR are minimal. The current proposed project eliminates two features evaluated in the PMND: the proposed bike/pedestrian path along the Marina Green and the children's play structure in the East Harbor area. All other project components are the same.

Comments concerning the scope of the EIR are welcomed. In order for your concerns to be fully considered throughout the environmental review process, we would appreciate receiving them by **April 17, 2005**. Written comments should be sent to Paul Maltzer, San Francisco Planning Department, 1660 Mission Street, Suite 500, San Francisco, CA 94103. If you work for an agency that is a Responsible or a Trustee Agency, we need to know the views of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. We will also need the name of the contact person for your agency. If you have questions concerning environmental review of the proposed project, please contact **Lisa Gibson** at **(415) 558-5993**.

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Date of this Notice: March 19, 2005

Lead Agency: Planning Department, City and County of San Francisco
1660 Mission Street, 5th Floor, San Francisco, CA 94103
Agency Contact Person: Lisa Gibson **Telephone:** (415) 558-5993

Project Title: 2002.1129E – San Francisco Marina Renovation
Project Sponsor: San Francisco Recreation and Park Department
Project Contact Person: Edgar Lopez, San Francisco Department of Public Works
Telephone: (415) 557-4675

Project Address: San Francisco Marina Yacht Harbor, 3950 Scott Street, San Francisco, CA 94123
Assessor's Block and Lot: Assessor's Block 900, Lot 003
City and County: San Francisco

Project Description: The proposed project is the renovation of the San Francisco Marina, including improvements to water-side and land-side facilities and the addition of a 1,000-square-foot maintenance building. Water-side improvements would include installation of three new breakwater structures and the removal of two existing breakwater structures; reconstruction of portions of the degraded rip-rap slopes around the interior shorelines of the marina and along the outer seawall (between the St. Francis and Golden Gate Yacht Clubs); maintenance dredging; replacement and reconfiguration of the floating docks and slips; replacement of gangways and security gates; installation of an oily water and sewage pumpout facility and refurbishment of two sewage pumpout facilities; upgrade of electrical and water services to the new floating docks; and improved lighting on the docks. Land-side improvements would include renovation of marina restroom, shower, and office buildings; conversion of a vacant building (former Navy Degaussing Station) into office space; construction of a new maintenance building; and restriping of existing parking lots. The project site is within a P (Public) District and an OS (Open Space) Height and Bulk District.

Building Permit Application Number(s), if Applicable: Not yet filed.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT. AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determination of Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons as documented in the Initial Study for the project, which is attached.

Written comments on the scope of the EIR will be accepted until the close of business on **April 17, 2005**. Written comments should be sent to Paul Maltzer, San Francisco Planning Department, 1660 Mission Street, Suite 500, San Francisco, CA 94103.

State Agencies. We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

March 19, 2005
Date


Paul E. Maltzer, Environmental Review Officer

DEFINITIONS

Many of the terms used in this document may be unfamiliar to readers. This list of definitions is included to orient readers to the terms used to describe common features of marinas and waterfront developments that are integral to the project. Please refer to this list as necessary when reviewing the attached Initial Study.

Aft: At, in, toward, or close to the stern (rear) of a vessel.

Breakwater: A barrier that protects a harbor or shore from the full impact of waves.

Dock: A platform that forms the space for receiving or mooring a boat.

Fill: The Bay Conservation and Development Commission (BCDC) defines fill as “earth or any other substance or material, including pilings or structures placed on pilings, and structures floating at some or all times and moored for extended periods, such as houseboats and floating docks.”

Float: A pier that floats on top of the water, with guide piles driven as needed to maintain its location.

Gangway: A bridge for getting to and from floats and docks from the shore.

Jetty: A structure, such as a pier, that projects into a body of water to influence the current or tide or to protect a harbor or shoreline from storms or erosion.

Mole: A solid fill barrier that protects a harbor or shore from the full impact of waves, similar to a breakwater.

Pier: A pile-supported structure over water that extends out from the seawall.

Pile or piling: A long, slender column, usually of timber, steel, or reinforced concrete, that is driven into the ground to carry a vertical load. Piers and floating docks are typically supported or secured by pilings. Pilings were historically made of timber and coated with creosote (a distillation of coal tar), a substance that promoted longevity. As creosote is now known to be a contaminant, the Port of San Francisco and several state and federal regulatory agencies require the use of concrete, steel, or pressure-treated wood pilings.

Port: The left-hand side of a boat, ship, or aircraft as one faces forward.

Revetment: A facing of wood, stone, or any other material placed to sustain an embankment when it receives a slope steeper than the natural slope; also, a retaining wall.

Rip-rap: A loose assemblage of broken stones erected in water or on soft ground as a foundation.

Seawall: A retaining wall that separates land from a body of water.

Starboard: The right-hand side of a boat, ship, or aircraft as one faces forward.

SAN FRANCISCO MARINA RENOVATION

INITIAL STUDY

Planning Department Case Number 2002.1129E

State Clearinghouse Number 2003122131

I. PROJECT DESCRIPTION

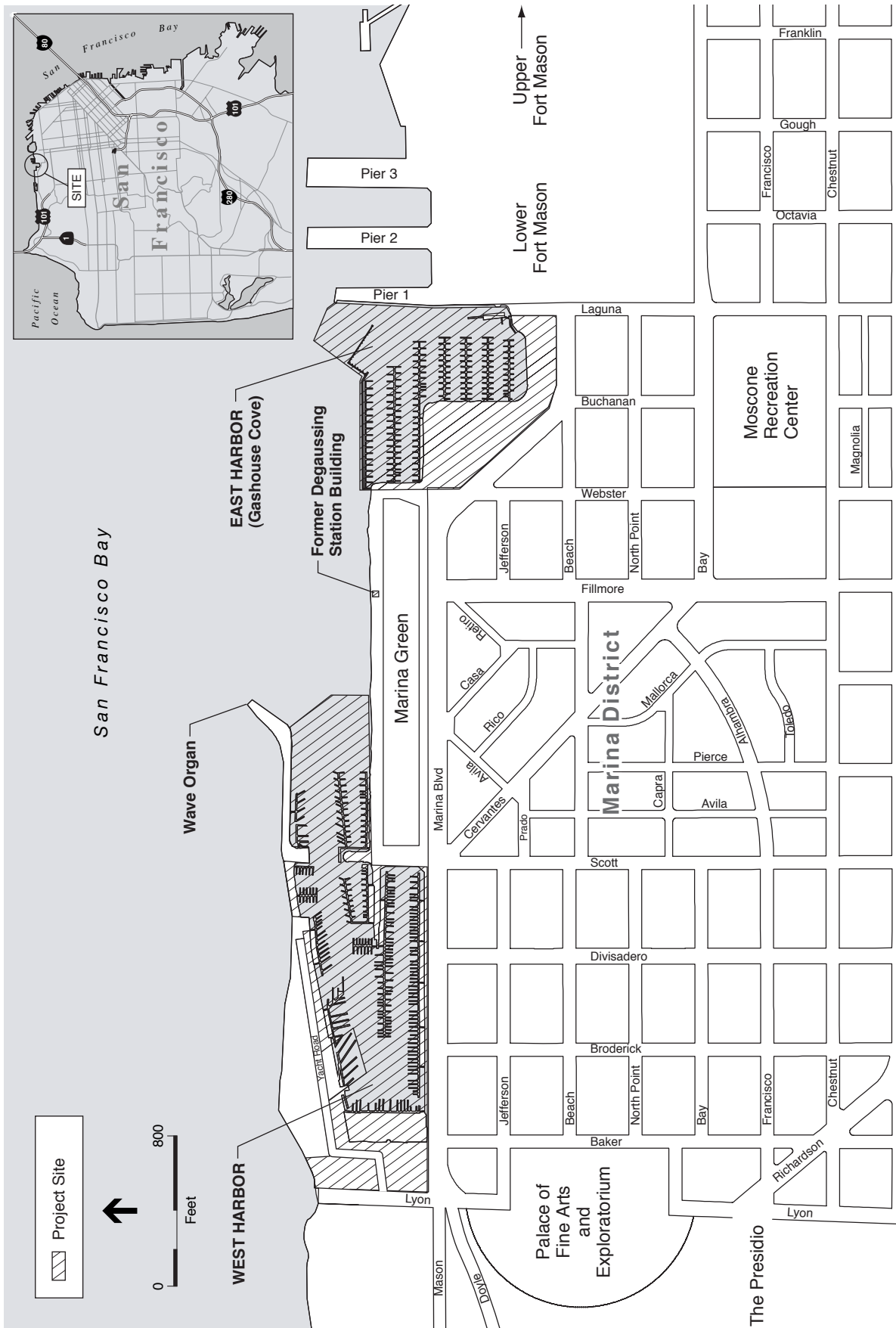
PROJECT PURPOSE

The San Francisco Department of Public Works, on behalf of the San Francisco Recreation and Park Department, proposes to renovate and rehabilitate facilities at the San Francisco Marina (3950 Scott Street; Assessor's Block 900, Lot 003), situated between Fort Mason and the Presidio, located on San Francisco's northern waterfront (see Figure 1, Project Location). The San Francisco Marina consists of two harbors: the West Harbor and the East Harbor. Both harbors are in a degraded condition due to deferred maintenance, damage from wave action and storms, and routine heavy use. In addition, the wood materials used to construct the docks, slips, and pilings are well beyond their useful life expectancy. Some marina facilities have been removed over the years (due to the cost of repairs), and many of the docks and associated utilities have become obsolete or unsafe for marina tenants, guests, and other users.

The marina is used year-round as a recreational boating center. Berths at the marina are in high demand, with an active waiting list of several hundred boat-owners. This renovation program proposes to repair, replace, and/or upgrade marina facilities to provide a safer, more up-to-date marina with a longer useful life and a slip size distribution that more closely matches market demand. The renovation includes improvements to on-shore facilities (e.g., restrooms and the Harbor Office) to better serve marina tenants as well as the general public. A discussion of the purpose of specific project components is provided on page 13.

EXISTING FACILITIES

The San Francisco Marina is located in the Marina District on San Francisco's northern waterfront, on property under the jurisdiction of the San Francisco Recreation and Parks Commission. The marina is bounded by Marina Boulevard to the south, Laguna Street to the east, Lyon Street to the west, and San Francisco Bay to the north. The marina consists of two harbors: East Harbor, also known as Gashouse Cove, and West Harbor. The East Harbor encompasses about 600,000 square feet of water area. The West Harbor covers about 1,100,000 square feet of water area in two basins: an inner basin and an outer basin (about 39 acres in total for both harbors). The total land area of both harbors, including sidewalks, gangways, and parking, covers about 830,000 square feet (about 19 acres). Figure 2 shows the Existing Site Plan.

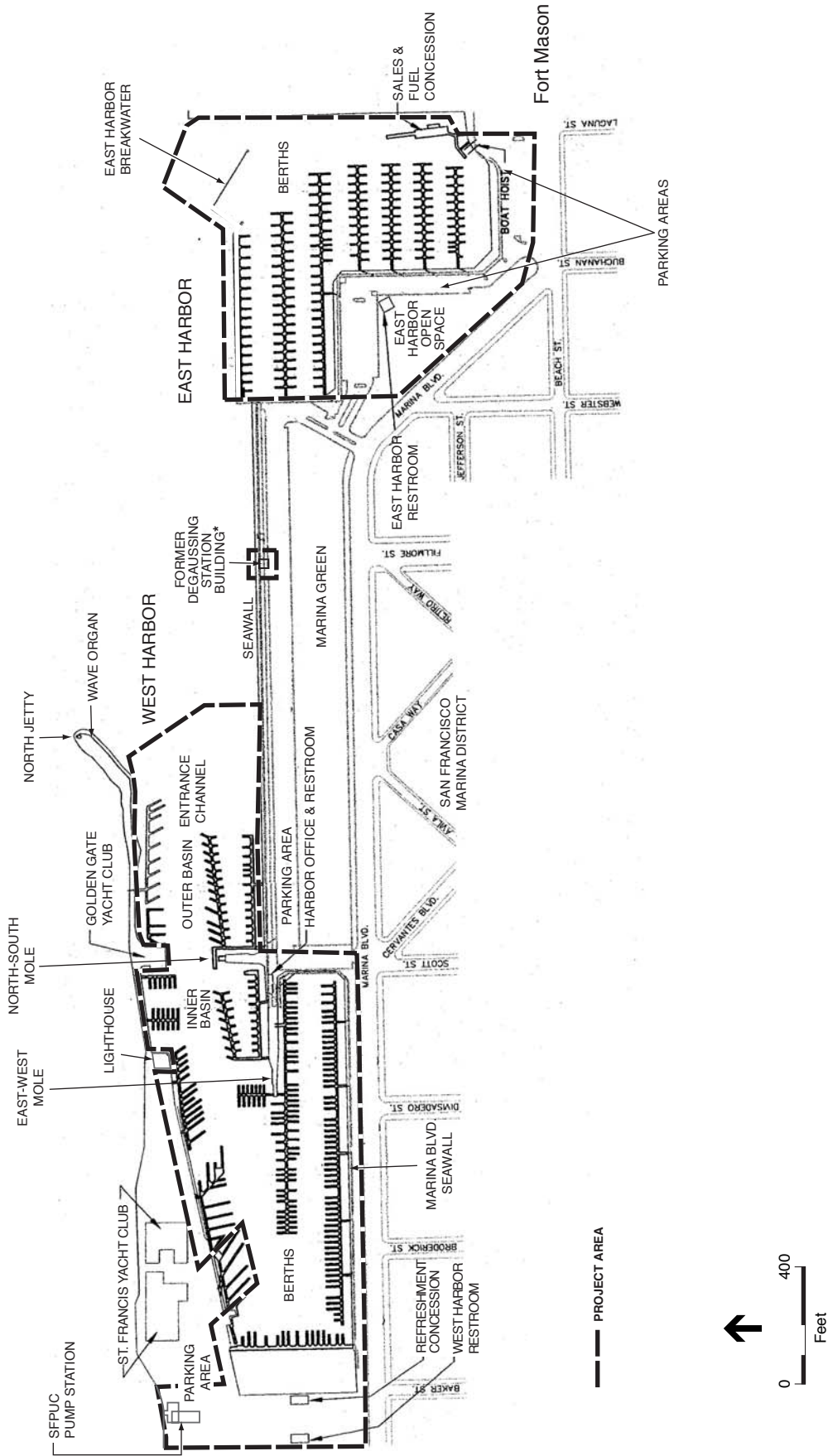


San Francisco Marina Renovation Project / 203305

Figure 1
Project Location

SOURCE: Environmental Science Associates

San Francisco Bay



* Project area around building is shown larger for illustrative purposes

SOURCE: Department of Public Works, Bureau of Engineering, City and County of San Francisco

San Francisco Marina Renovation Project / 203305

Figure 2
Existing Site Plan

The West Harbor marina facilities include the Harbor Office building (which also houses a public restroom and tenant showers) a refreshment concession stand, four parking lots, and slips to accommodate 326 boats. The Recreation and Park Department also uses an existing San Francisco Public Utilities Commission (SFPUC) pump station as a maintenance building in the West Harbor to support marina operations. Located adjacent to the West Harbor, but outside of the project area, are the St. Francis and Golden Gate Yacht Clubs, a miniature lighthouse (no longer in use), and the wave organ at the tip of the North Jetty. The East Harbor consists of slips for 342 boats, yachts sales and fuel concession, a boat hoist and adjacent trailered boat parking lot, a public restroom, and two vehicular parking lots. Boat slips in both harbors consist of wooden floating docks and gangways supported by creosote-treated wood pilings. Slips are supplied with water and electric service, and docks are lighted at night.

PROJECT COMPONENTS

The San Francisco Marina Renovation Program (the project) consists of renovations to selected marina facilities in both the East and West Harbors of the San Francisco Marina. The project area includes water-side improvements over the entire 39-acre water-side portion of the marina and on 12 of the total 19 land-side acres. The project does not include any improvements to the St. Francis or Golden Gate Yacht Clubs, the lighthouse, the Marina Green¹ or the SFPUC pump station (although Recreation and Park Department use of the SFPUC facility would end).

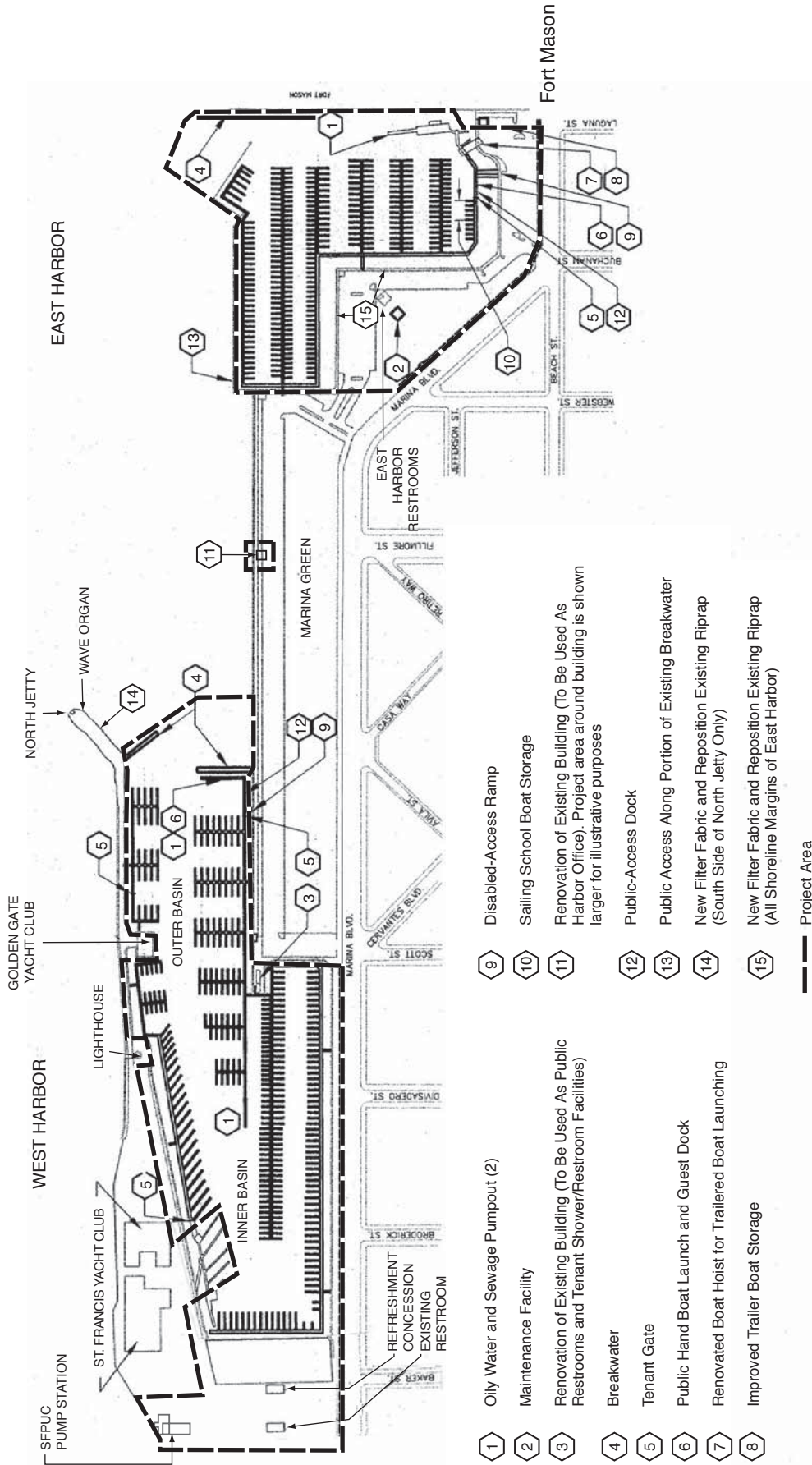
Water-side marina renovations would include installation of three new breakwater segments (one in the East Harbor and two in the West Harbor); removal of two existing breakwater structures (moles) in the West Harbor; reconstruction of portions of the degraded rip-rap slopes around the interior shorelines of both harbors; replacement and reconfiguration of the floating docks and slips, including replacement of wood piles with concrete piles; addition of two hand boat launches (one in the East Harbor and one in the West Harbor); maintenance dredging of about 181,000 cubic yards of material (87,000 cubic yards from the West Harbor and 94,000 cubic yards from the East Harbor); replacement of gangways and security gates; installation of one oily water and sewage pumpout facility in the West Harbor (and refurbishment of the two existing sewage pumpouts – one in the West Harbor and one in the East Harbor - to replace aging mechanical equipment); and upgrades of electrical and water services to the new floating docks and improved lighting on the docks in both harbors. At project completion, the total number of boat berths would decrease from 668 to 628, although the average berth length would increase from about 32 feet to 38.5 feet.² Not included in the total number of slips are four 110-foot berths in the West Harbor leased to the St. Francis Yacht Club, which would remain unchanged under the project (see Figure 2). Proposed water-side improvements are shown in Figure 3 and described in greater detail in Table 1.

While the total number of boat berths would decrease by 40, the area of water currently occupied by floating docks would increase by about 34,000 square feet. New berths would be located in portions of the

¹ While there is no legal definition of the Marina Green boundaries, this area is commonly associated with the rectangular greensward bound by Marina Boulevard on the south, San Francisco Bay on the north, Scott Street on the west and Webster Street on the east. Parkland areas east of Webster Street are associated with the East Harbor of the San Francisco Marina and are therefore not considered part of the Marina Green.

² With the proposed improvements, the mix of berths would shift from primarily 25- and 30-foot berths (56 percent of current makeup, with 35- and 40-foot berths composing an additional 24 percent) to primarily 30- and 35-foot berths (54 percent proposed mix with 40-foot berths composing an additional 23 percent).

San Francisco Bay



San Francisco Marina Renovation Project / 203305
Figure 3
 Proposed Site Plan

SOURCE: Department of Public Works, Bureau of Engineering, City and County of San Francisco

**TABLE 1
PROPOSED WATER-SIDE IMPROVEMENTS**

Element	Existing Conditions	Proposed Project Improvements
WEST HARBOR		
Outer Basin Breakwater	North jetty, about 2,200 feet long	Add 150-foot-long breakwater perpendicular to existing north jetty (either sheetpile or rock) Add 200-foot-long rock breakwater perpendicular to Marina Green seawall at south side of basin (either sheetpile or rock). For rock breakwaters only, this would result in placement of 10,000 to 15,000 square feet of new fill below mean high tide [MHT]. Sheetpile; substantially less.
Inner Basin Breakwater	Breakwater (moles) at foot of Scott Street	Remove north-south mole, shorten east-west mole (This would result in the removal of 12,000 cubic yards/16,000 square feet of existing fill below MHT)
Revetments	2,200-foot-long north jetty (protected with rip-rap along shoreline)	Add filter fabric and reposition existing rip-rap along approximately 350 lineal feet of shoreline on the south side of the north jetty
Boat Services	One sewage pumpout	Renovate existing pumpout and add one new, resulting in 2 oily water and 2 sewage pumpout facilities at the same location.
Public Access	Guest dock	Refurbish guest dock and add a hand boat launch
Dredging	None, although dredging is done periodically as part of marina maintenance (the West Harbor was last dredged in 2001)*	Maintenance dredge 87,000 cubic yards authorized under existing maintenance dredging permit issued by the U.S. Army Corps of Engineers
EAST HARBOR		
Breakwater	600-foot-long concrete and 250-foot-long sheetpile breakwater	Add 450-foot long by 15 to 20-foot wide floating breakwater (wave attenuation structure) adjacent to Fort Mason pier. (This would result in the placement of 200 square feet of new fill below MHT)
Revetments	About 1,550 lineal feet of shoreline rip-rap	Add new filter fabric and reposition existing rip-rap along approximately 350 lineal feet of shoreline
Boat Services	Boat hoist (not operational) One sewage pumpout Boat sales and fuel concession Used oil and oil filter recycling kiosk	Renovate boat hoist Refurbish sewage pumpout facility (to include capacity for oily wastewater) Sales and fuel facility to remain Recycling kiosk to remain
Public Access	None	Install public access dock with hand boat launch and guest dock Construct public access path along 500 lineal feet of existing breakwater
Dredging	None (the East Harbor was last dredged in 1989)	New dredging of 94,000 cubic yards; additional sediment sampling and testing will be required before a permit for dredging and disposal can be obtained. Place engineered cap of clean fill.

**TABLE 1 (Continued)
PROPOSED WATER-SIDE IMPROVEMENTS**

Element	Existing Conditions	Proposed Project Improvements
BOTH HARBORS		
Floating Docks	<p>Floating docks supported by 705 creosote-treated wood pilings</p> <p>Wooden floating docks on timber pilings providing berths for 668 boats</p> <p>Average berth length of 32 feet</p> <p>Majority of West Harbor slips oriented north-south</p> <p>Approximately 120,200 square feet of area covered by floating docks</p> <p>21,280 linear feet (LF) of floating docks</p>	<p>Remove 705 creosote-treated wood piles and replace with 750 concrete piles (12- to 18-inch-diameter, 40- to 60-foot-long concrete piles to be driven within the footprint of marina docks, to extend about 5 feet above MHT); reduce total number of boat berths to 628</p> <p>Increase average length of berths to 38.5 feet</p> <p>Change orientation of about half of the West Harbor slips to east-west</p> <p>Estimated net increase in area covered after removal and reconfiguration of existing docks: 34,000 square feet</p> <p>Estimated net increase in floating docks: 3,335 LF</p>
Slip Size (Number of Slips / Percent of Total)	<p>20 feet: 39 / 6%</p> <p>25 feet: 216 / 32%</p> <p>30 feet: 174 / 26%</p> <p>35 feet: 90 / 13%</p> <p>40 feet: 75 / 11%</p> <p>45 feet: 25 / 4%</p> <p>50 feet: 17 / 3%</p> <p>60 feet: 26 / 4%</p> <p>70 feet: 0 / 0%</p> <p>80 feet: 2 / 0.2%</p> <p>90 feet: 4 / 0.6%</p> <p>Ave. Length: 32 feet</p>	<p>20 feet: 0 / 0%</p> <p>25 feet: 16 / 2%</p> <p>30 feet: 148 / 24%</p> <p>35 feet: 190 / 30%</p> <p>40 feet: 141 / 23%</p> <p>45 feet: 53 / 8%</p> <p>50 feet: 41 / 7%</p> <p>60 feet: 26 / 4%</p> <p>70 feet: 4 / 0.6%</p> <p>80 feet: 4 / 0.6%</p> <p>90 feet: 5 / 0.8%</p> <p>Ave. Length: 38.5 feet</p>
Boat Type Mix (as estimated by the Harbormaster)	63% sailboats / 37% power boats	63% sailboats / 37% power boats
Utilities	Electrical service; water service; fire protection (fire extinguishers, not plumbed water service); and lighting	<p>Upgrade electrical service to minimum capacity of 30 amps per berth; eliminate exposed cables and wires</p> <p>Upgrade water system and fire protection stations on floating docks to meet applicable codes; replace water lines and add new pipes and valves for fire control access</p> <p>Replace and standardize telephone service conduits</p> <p>Install new lights on docks as docks are replaced (lights would be near ground level to light walking path)</p>

Access	23 gates and 24 wooden gangways and 3 aluminum gangways	<p>Replace gates with new units and reduce the total number of gates from 23 to 10 (3 in East Harbor, 7 in West Harbor)</p> <p>Replace wooden gangways with aluminum units and reduce the total number of gangways from 24 to 10 (3 in East Harbor and 7 in West Harbor)</p> <p>Add 1 Americans with Disabilities Act (ADA)-compliant access ramp in West Harbor and 1 ADA-compliant access ramp in East Harbor</p>
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*The San Francisco Planning Department determined that the West Harbor dredging could not have a significant effect on the environment and issued a Negative Declaration for that project on May 18, 1999. This document is available for review by appointment as part of Case File No. 1998.834E at 1660 Mission Street, Suite 500, San Francisco, CA 94618.

SOURCE: Department of Public Works, City and County of San Francisco, 2004

outer basin of the West Harbor where none³ currently exist, and about 123 berths or about 40 percent of the berths in the West Harbor, would be realigned from a north-south orientation to an east-west orientation to face the prevailing winds for safer maneuvering. Similar to existing berths in the East Harbor, all new berths in the East Harbor would maintain a north-south orientation.

The dredging plan for the marina is currently in the design stages. All dredging activities, including sediment disposal, would occur in accordance with regulatory agency permit requirements. It is anticipated that all dredging activities in the East Harbor, specifically, would entail a few feet of over-dredging to allow for the installation of an engineered cap of clean fill, preventing water contact with potentially contaminated sediments in this area. As envisioned currently, the dredging in the East Harbor would have a target depth of 8 feet under the berths and 12 feet in the channels, with a two-foot over-dredge in both locations for the placement of the engineered cap.

The land-side project improvements would include: renovation of the existing Harbor Office building public restrooms and conversion of 400 square feet of existing office space into tenant showers and restrooms; renovation of an existing former Degaussing Station⁴ (now vacant) for use as the new Harbor Office; renovation of the restrooms in the existing 1,970-square-foot East Harbor public restroom building, with the addition of about 600 square feet for tenant showers and restrooms; construction of a new 1,000-square-foot, one-story maintenance building near the East Harbor restrooms (used to store material for maintenance of marina facilities); improvements to on-shore electrical and telephone utilities; and access modifications to the parking lots. With the construction of the new maintenance building for material storage, the Recreation and Park Department would no longer use the existing 1,500-square-foot SFPUC pump station in the West Harbor. After renovation of the boat hoist in the East Harbor, approximately 24 trailered boats could be accommodated in the existing trailered boat storage area adjacent to the hoist.

³ Some of the new berths would technically replace berths which had existed in the outer basin of the West Harbor historically, but were removed over time due to deterioration or unsafe conditions. For purposes of this Initial Study, however, they would be considered new.

⁴ The Degaussing Station was used by the U.S. Navy as a base for demagnetizing ships during the World War II era. Ships going into or coming out of the harbor were demagnetized to prevent them from attracting magnetic mines.

Additional land-side improvements would include new and improved informational and directional signs in the marina in addition to parking lot improvements. The East Harbor parking area would be improved by renovating an existing boat hoist for boat launching and reutilizing the boat trailer storage area immediately southeast of the boat hoist. The approximately 13,600-square-foot boat storage area is currently unused because the boat hoist is non-operational, but has the capacity to hold a maximum of approximately 24 trailered boats at one time. Once the boat hoist has been renovated, it is expected that trailered boat storage would occur on a daily basis. It is also assumed that some of the small craft currently berthed at the Marina would convert to put-in/take-out use at the boat hoist area. No change in the number of parking spaces would occur at either the East or West Harbor parking lots, although access control barriers would be installed to allow boater-only access to designated parking spaces between the hours of 10:00 p.m. and 6:00 a.m. (when marina restrooms and Park are closed). These parking spaces are currently designated as boater-only parking between the hours of 10:00 p.m. and 6:00 a.m., although no access controls are in place.

Public access improvements would include public restroom improvements; improved public access along a portion of the East Harbor breakwater; and ADA-compliant access ramps in the East and West Harbors. Land-side improvements are shown in Figure 3 and described in more detail in Table 2.

PROJECT SETTING

The project site is in an area predominately characterized by recreational and open space uses along the waterfront and residential and neighborhood commercial uses inland. The marina is situated between Fort Mason and the Presidio, both of which are part of the Golden Gate National Recreation Area (GGNRA). The GGNRA is one of the largest and most visited national parks in an urban setting, comprising 74,000 acres of open space and recreational uses along 28 miles of coastline in San Francisco, Marin, and San Mateo Counties. The National Park Service also considers the marina to be within the boundaries of the GGNRA. At the east end of the West Harbor (north) jetty is the wave organ, a wave-activated acoustical structure. The wave organ includes 25 organ pipes located at various elevations within the site. Sound is created by the impact of waves against the pipe ends and the subsequent movement of the water in and out of the pipes.

To the west of the marina is the Presidio. The Presidio, a former active military base, became the newest public park in the GGNRA in 1994. Since 1998, the Presidio has been jointly managed by the National Park Service and the Presidio Trust. The Presidio contains a total land area of 1,480 acres that includes 500 historic buildings, a collection of coastal defense fortifications, a national cemetery, a saltwater marsh and ecological reserve, forests, beaches, native plant habitats, coastal bluffs, and hiking and biking trails.

To the east of the San Francisco Marina is Fort Mason Center. In use by the military for over 200 years, Fort Mason became part of the GGNRA in 1977, with the aim of converting the former military installation to civilian use. Since then, the Fort Mason Center has become one of the City's cultural centers, containing 40 nonprofit organizations as well as museums, theaters, and restaurants. Included

**TABLE 2
PROPOSED LAND-SIDE IMPROVEMENTS**

Element	Existing Conditions	Proposed Project Improvement
WEST HARBOR		
Harbor Office	1,100-square-foot building used for office, public restrooms, and tenant showers. Office hours of operation: 8a.m. – 5p.m. (M-F), 8a.m. – 5p.m. (weekends), staff on duty until midnight patrolling the grounds.	Convert 400 square feet of office space into tenant restrooms and showers (add 2 sinks and 2 toilets); no square footage would be added. Hours of operation: 6a.m. – 10p.m. (7 days/week)
Public Restroom (Harbor Office)	1,000-square-foot public restroom	Upgrade for ADA compliance
SFPUC Pump Station	Currently used by the Recreation and Park Department as maintenance facility to store materials used in marina maintenance (about 1,500 square feet in use)	No physical changes; Recreation and Park Department would no longer use this facility
Parking	Approximately 719 spaces (495 general spaces, 206 boater-only spaces, 18 handicap spaces)	Install suitable barriers on boater-only spaces to control access during the restricted parking period (from 10:00 p.m. until 6:00 a.m., daily); no change in number of spaces
Landscaping	Grass with a few trees and shrubs	Replace distressed or dead trees and shrubs and re-seed grass as necessary (not DBW funded)
EAST HARBOR		
Restroom	1,970-square-foot public restroom	Expand 600 square feet to add tenant showers and restrooms (add 6 toilets, 6 sinks, and 6 shower stalls); limited excavation required (less than 10 cubic yards) Upgrade existing public restroom for ADA compliance
Area Adjacent to Restroom	Open space, grass	Construct new, one-story, 1,000-square-foot, ADA-compliant maintenance building (about 32 feet square by about 15 feet high). Limited shallow excavation required (about 100 cubic yards)
Parking	Approximately 441 total parking spaces (340 general spaces, 95 boater-only spaces, 6 handicap spaces)	Install suitable barriers on boater-only spaces to control access during the restricted parking period (from 10:00 p.m. until 6:00 a.m., daily); no change in number of spaces
Landscaping	Landscaped strip about 10 feet wide along edge of harbor and near restroom	Repair damaged or distressed trees, shrubs, and grasses along landscaped edge and plant new grass and shrubs near new maintenance building and renovated restroom (not DBW funded)

**TABLE 2 (Continued)
PROPOSED LAND-SIDE IMPROVEMENTS**

Element	Existing Conditions	Proposed Project Improvement
BOTH HARBORS		
Former Degaussing Station Building	Vacant 700-square-foot building	Renovate for use as Harbor Office; no additional square footage would be added; existing porch would be enclosed; a new egress would be added; other renovations would be to the interior of the building (reconstruction of interior walls; new plumbing, wiring, paint, light fixtures, and flooring). Upgrade for ADA compliance. Office hours: 8a.m. – 5p.m. (M-F), 8a.m. – 5p.m. (weekends), staff on duty until midnight patrolling grounds.

SOURCE: Department of Public Works, City and County of San Francisco, 2004

within the Fort Mason Center is the San Francisco Port of Embarkation National Historical Landmark District. Other recreational and educational uses in the vicinity of the project site include Marina Green park adjacent to and south of the marina; Aquatic Park to the east of Fort Mason; and the Palace of Fine Arts lagoon and park (which also includes the Exploratorium, a hands-on science museum for children) southwest of the marina.

Residential uses are located to the south, southeast, and southwest of the marina. Single-family homes line the south side of Marina Boulevard across the street from the project site. These homes are mostly two to three stories and are typically set back from the street. Many of these homes date from the 1920s; however, some contemporary infill development has occurred. Spanish eclectic and Mediterranean styles define the residential character of the area; common building materials include wood, stucco, and terra cotta. Larger, multi-family apartment houses, generally four stories tall, are located to the south and southwest of the site, predominately along Alhambra, Beach, Fillmore, and Scott Streets.

Small-scale neighborhood commercial uses are located along the Marina District’s main shopping thoroughfare, Chestnut Street, located approximately four blocks south of the project site. Chestnut Street consists of a diverse mix of shops, restaurants, and services in a neighborhood setting. An existing shopping center (Marina Safeway) is located immediately south of the East Harbor between Buchanan and Laguna Streets. South of North Point Street, small commercial establishments are located on the ground floor of mixed-use residential buildings.

The project site (within Assessor’s Block 900, Lot 003) is in a P (Public) District and an OS (Open Space) Height and Bulk District. The Presidio (west of the project site) and Fort Mason (east of the project site) are also zoned P and OS. Properties to the south of the project site are zoned RH-1, RH-2, and RH-3 (Residential House District, One-, Two-, and Three-Family, respectively); and RM-2 and RM-3 (Residential Mixed Districts, Moderate and Medium Density, respectively). Zoning to the southeast of

the project site includes NC-2 and NC-S Districts (Small-Scale Neighborhood Commercial and Neighborhood Commercial Shopping Center, respectively) along Chestnut and Buchanan Streets. Height and Bulk Districts in the project vicinity to the south of the marina are 40-X.

PROJECT SCHEDULE

Construction of the proposed project would take up to about 36 months (about 20 months in the West Harbor and 16 months in the East Harbor). Water-side work would be staged to limit displacement of existing marina tenants. The staging would involve replacement of portions of floats, pilings, and associated dredging in sections of the marina, with marina tenants temporarily relocated during each stage. A specific tenant relocation plan would be developed in conjunction with project design work to minimize the number and duration of temporary relocations.⁵ This relocation plan would first involve rebuilding the slips adjacent to the north jetty (at the entrance channel to the West [Outer] Harbor) that have been removed over the years. These rebuilt slips would then be used as temporary accommodation for boats displaced as construction proceeds from one area of a harbor to another. After design and permitting, project construction would be phased to begin in the West Harbor (where construction is expected to last for 20 months) and then move to the East Harbor (expected to last for 16 months). Land-side work would occur over the same period, concurrent with water-side work. Construction is anticipated to begin in 2006.

Project construction costs are estimated at \$26,037,000 (in 2002 dollars), to be funded through loans from the California Department of Boating and Waterways (DBW), although several possible funding mechanisms may be used. All project funding would be subject to the approval of the San Francisco Recreation and Parks Commission and Board of Supervisors.

PREVIOUS ENVIRONMENTAL REVIEW AND PUBLIC INVOLVEMENT

The proposed project was the subject of a Preliminary Mitigated Negative Declaration (PMND) published by the Planning Department on December 27, 2003. Following receipt of several appeals to the PMND, the Department decided to prepare an Environmental Impact Report (EIR). On October 27, 2004, the Planning Department held a public scoping meeting to receive public input on the proposed project. Individuals and agencies who received notice of the public scoping meeting included owners of properties within 300 feet of the project site; tenants of the project site, including boat owners; tenants of properties adjacent to the project site; and other potential interested parties, including various regional and state agencies. This Initial Study will be an appendix item to the EIR, to be published in mid 2005.

This Initial Study addresses many comments received from the public as part of the appeal of the PMND, and during the public scoping meeting, while other comments received will be addressed in the Draft EIR. In general, these comments pertain to the clarity of the project description; the project's consistency with plans and policies; the project's visual and aesthetic compatibility with existing Marina structures and views from the adjacent Golden Gate National Recreation Area; the project's effect on circulation and parking on Lower Fort Mason; construction noise; air emissions; nighttime lighting; sedimentation; risk of fuel spills; and cumulative impacts.

⁵ A model for the relocation plan would be based on a similar marina renovation project recently completed by the City of Monterey.

PURPOSE OF SPECIFIC COMPONENTS OF THE PROPOSED PROJECT

As discussed in the introduction above, the purpose of the project is to repair, replace, and/or upgrade marina facilities to provide a safer, more up-to-date marina with a longer useful life and a slip size distribution that more closely matches market demand. The renovation includes improvements to both water-side and land-side facilities to better serve marina tenants and guests, as well as the general public. The project sponsor's rationale for the inclusion, or in some cases the exclusion, of specific project components is described below:

PROPOSED BREAKWATERS

New breakwaters are proposed as part of the project to protect marina structures and boats from the damaging effects of north and northeast-driven waves. The DBW strongly recommends the installation of breakwaters in any area subject to damaging wave activity. The placement of breakwaters in the marina would be consistent with these recommendations. Elimination of this project component would jeopardize DBW funding for the project.

PROPOSED CHANGE IN SLIP SIZE AND CONSTRUCTION TYPE

A market feasibility study of the marina determined that there is a strong market demand for a different mix of slip sizes than is currently available at the marina, one that would accommodate the recent shift toward the ownership of larger boats, both sail and power, for both existing and future tenants and visitors (Moffatt & Nichol, 2001). Over half of the marina's existing slips are less than or equal to 30 feet in length. Approximately 85 percent of the more than 500 boaters on the marina waiting list desire slips greater than 30 feet in length.

Creosote pilings which supporting the existing slips and docks would be replaced with concrete pilings due to the environmental problems associated with creosote in a marine environment. Concrete is less toxic to the marine environment, and the removal of creosote pilings would improve overall water quality in the immediate area.

PROPOSED CHANGES TO THE DEGAUSSING STATION, MAINTENANCE FACILITY, AND RESTROOMS

Due to current office space constraints and inefficiencies (lack of ADA accessibility) in the existing Harbor Office, and the inability to modify the current location due to size constraints, the Degaussing Station would be renovated to make it accessible to people with disabilities and those who need assistance or information from the Harbor Master. Moving the Harbor Office to the Degaussing Station would also free up space to convert the existing Harbor Office to an ADA-compliant public restroom. The Harbor Office located in the renovated Degaussing Station would be approximately equidistant from the East and West Harbors. Currently, the Harbor Office is located in the West Harbor, too far away from activities in the East Harbor.

The Recreation and Parks Department would construct a new maintenance facility to replace the current maintenance facility, which is owned by the SFPUC, who have expressed the desire to close this facility.

The new maintenance building would be located at the East Harbor to be more centrally located, and for its adjacency with other structures in the area (the East Harbor Restrooms).

The East Harbor Restrooms would be expanded and/or renovated for ADA compliance. They are intended for the use of “boaters only,” similar to the West Harbor restrooms and showers. By providing bathroom and shower facilities, the marina would be able to accommodate guest boaters in the East Harbor (guest boaters are currently accommodated in the West Harbor only). Guests and permanent boaters would then be more inclined to use landside shower and toilets, and less inclined to use their on-board toilets and showers, which would reduce accidental spills and/or overflows from vessel’s holding tanks. These measures would improve water quality in the East Harbor. Public restrooms would be open during park hours (6 a.m.-10 p.m.) as they are currently. Boaters-only restrooms would be accessed with a key at any time, as they are currently.

SEAWALL IMPROVEMENTS NOT PROPOSED AS PART OF THE PROJECT

Upgrades to the seawalls are not proposed as part of the project due to the prohibitive cost associated with structural repairs. The project would be funded by a loan from DBW, which limits the scope of repairs to marina use improvements.

II. ENVIRONMENTAL EVALUATION CHECKLIST AND DISCUSSION

A. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<u>Not</u> <u>Applicable</u>	<u>Discussed</u>
1) Discuss any variances, special authorizations, or changes proposed to the City Planning Code or Zoning Map, if applicable.	_____	_____ X _____
2) Discuss any conflicts with any adopted environmental plans and goals of the City or Region, if applicable.	_____	_____ X _____

The City and County of San Francisco Planning Code (Planning Code), which incorporates by reference the City’s Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the Planning Code, or an exception is granted pursuant to provisions of the Planning Code. Approval of the proposed project would result in some intensification of development on the project site, the specific impacts of which are discussed below under the relevant topic heading.

The project site is within a P (Public) District and an OS (Open Space) Height and Bulk District. P Districts refer to land that is owned by a governmental agency and is in some sort of public use, including open space. Principal permitted uses in P Zoning Districts include structures and uses of the City and County of San Francisco, as well as other governmental agencies, including accessory nonpublic

uses, when in conformity with the San Francisco General Plan (General Plan) and the provisions of other applicable laws, ordinances, and regulations (Planning Code Section 234.1[b]).

The project site is identified in the San Francisco Bay Plan (Bay Plan). The Bay Plan, adopted in 1969 and since amended, specifies goals, objectives, and policies for San Francisco Bay and shoreline, and is administered by the San Francisco Bay Conservation and Development Commission (BCDC). The Bay Plan identifies policies for recreational use of the Bay and for marinas, as well as specific plans for San Francisco's northern waterfront, from the Presidio to Aquatic Park. While the Bay Plan does not specifically identify policies for the San Francisco Marina, policies applicable to the Presidio and Fort Mason could be considered influential due to the proximity of these areas to the proposed project. The Bay Plan identifies the Presidio and Fort Mason as "priority use areas." Specific to the northern waterfront, priority use areas are guided by the three following land use principals: (1) maintain compatible use of buildings; (2) provide continuous shoreline access; and (3) develop and manage areas within National Park jurisdiction for open space and water-oriented recreation. The proposed project would generally comply with the Bay Plan and would require a BCDC Major Permit.

Environmental plans and policies are those, like the Bay Area Air Quality Plan, which directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City's physical environment. The current proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

The General Plan, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The current project would not obviously or substantially conflict with any such policy. In general, potential conflicts with the General Plan are considered by decision-makers independently of the environmental review process, as part of the decision to approve or disapprove a proposed project. Any potential conflict not identified herein could be considered in that context and would not alter the physical environmental effects of the proposed project.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the Planning Code to establish eight Priority Policies. These policies are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) preservation and enhancement of affordable housing; (4) discouragement of commuter automobiles; (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness; (7) landmark and historic building preservation; and (8) protection of open space. The Priority Policies, which provide general policies and objectives to guide certain land use decisions, contain some policies that relate to physical environmental issues. The proposed project would not obviously or substantially conflict with any such policy. Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. In reviewing the building permit application for the proposed project, the Planning Department would make the necessary findings of consistency with the Priority Policies.

While no changes to the City Planning Code or conflicts with local plans and policies are anticipated as a result of the proposed project, these issues will be discussed in the EIR for informational purposes.

B. ENVIRONMENTAL EFFECTS

Items on the Initial Study Checklist checked “No,” indicate that, upon evaluation, the San Francisco Planning Department has determined that the proposed project could not have a significant adverse environmental effect. Several of those checklist items have also been checked “Discussed,” indicating that the Initial Study text includes discussion about that particular issue. For all of the items checked “No,” without discussion, the conclusions regarding potential significant adverse environmental effects are based on field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Planning Department (such as the Transportation Guidelines for Environmental Review), or on review of the California Natural Diversity Database and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation considered the impacts of the project both individually and cumulatively. Items that are listed as “To Be Determined” indicate that upon evaluation, the San Francisco Planning Department has determined that the proposed project may have a significant adverse environmental effect, requiring further analysis in the EIR.

1) <u>Land Use</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Disrupt or divide the physical arrangement of an established community?	_____	_____ <u>X</u> _____	_____ <u>X</u> _____
(b) Have any substantial impact upon the existing character of the vicinity?	_____	_____ <u>X</u> _____	_____ <u>X</u> _____

Land uses on the project site include water-oriented/maritime recreational, open space, public facilities, and other uses ancillary to the operation of the marina, such as surface parking in both the West and East Harbors, and a pump station owned by the San Francisco Public Utilities Commission (SFPUC) (and used, in part, for storage of marina maintenance equipment and materials). The former Degaussing Station, now vacant, is located north of the Marina Green, adjacent to the pedestrian promenade along the marina’s seawall. The Degaussing Station has existed in this location since 1951 and was reconstructed in 1984.

The project site (within Assessor’s Block 900, Lot 003) is within a P (Public) District and an OS (Open Space) Height and Bulk District. The Presidio (west of the project site) and Fort Mason (east of the project site) are also zoned P (Public). Properties to the south of the project site are zoned RH-1, RH-2, and RH-3 (Residential House District, One-, Two-, and Three-Family, respectively), and RM-2 and RM-3 (Residential Mixed Districts, Moderate and Medium Density, respectively); zoning to the southeast of the project site includes NC-2 and NC-S Districts (Small-Scale Neighborhood Commercial and Neighborhood Commercial Shopping Center, respectively) along Chestnut and Buchanan Streets. Height and Bulk Districts to the south of the marina are 40-X.

With the project, there would be no change to the existing variety of recreational and open space on the project site, except for the construction of one 1,000-square-foot, single-story maintenance building in a

portion of the East Harbor open space area which is currently open lawn. This relatively small reduction in lawn area would not substantially preclude the use or enjoyment of area for recreational purposes. The project would also shift the office use at the existing Harbor Office to the currently vacant Degaussing Station.

Land use impacts are considered to be significant if a project would disrupt or divide the physical arrangement of an established community, or if it would have a substantial impact upon the existing character of the vicinity. While the proposed project would represent changes to site development, the project would not cause a significant adverse land use impact. The proposed project would not disrupt or divide the physical arrangements of existing uses and activities that surround it, nor would it displace any businesses, residences, or other uses. Implementation of the proposed project may attract new (public) boating and recreation users onto the project site with the addition of hand boat launches, renovation of the existing boat hoist, and improvements to public access and restrooms. These uses, however, have been ongoing at the site and vicinity for many years, and the proposed project would therefore be consistent with the existing maritime and recreational uses at the site. Implementation of the project would result in fewer, although (on average) longer, berths in the marina, which may attract some larger boats to the marina; however, several boats currently moored at the marina are in berths that are too small, and some existing marina tenants are expected to move their boats into the larger berths.

During the project's construction phases, existing marina users would be temporarily displaced while improvements occur; however, construction of these improvements would occur in phases, and temporary berths within the marina would be made available to those users directly affected. The construction would be phased to provide initial reconstruction of slips that have been removed over the life of the marina. These "new" slips would be used to accommodate boats as they are temporarily displaced for dredging, pile driving, and dock rebuilding in a small section of the marina. Once one section of rebuilding is complete, the displaced boats would be moved to their new berths and the next boats would be moved into temporary berths for the next phase of construction, and so on. A tenant relocation plan would be distributed, and the opportunity to discuss the plan with marina management would be given to all marina tenants prior to any construction. Long-term reduction in the number of slips is anticipated to occur through natural attrition as users leave the facility (more information about this process is described under Section 3. Population). The proposed project would also have temporary impacts on existing land-side site uses during construction, since the restrooms and Harbor Office would be closed for short periods during renovations. Temporary, portable toilet cabinets would be moved onto the site during restroom renovations. Construction would be scheduled so that the Degaussing Station would be renovated prior to the Harbor Office so that office equipment and personnel could be moved to their new locations prior to Harbor Office renovation.

The proposed project would not substantially affect any of the existing off-site uses and activities, such as the open space in the Marina Green⁶ or the wave organ located outside the project area. Surrounding uses and activities would therefore generally continue and would interrelate with each other as they do presently, without disruption from the proposed project and with no change in the character of the area. Therefore, the project would not result in significant impacts related to land use.

⁶ As described above, and shown in Figures 1 – 3, the Marina Green is adjacent to, but not part of, the project site.

While no potentially significant impacts to land use are anticipated as a result of the proposed project, the EIR will discuss land use issues for informational purposes.

2) <u>Visual Quality</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Have a substantial, demonstrable negative aesthetic effect?	<u>TO BE DETERMINED</u>		
(b) Substantially degrade or obstruct any scenic view or vista now observed from public areas?	<u>TO BE DETERMINED</u>		
(c) Generate obtrusive light or glare substantially impacting other properties?	_____	<u> X </u>	<u> X </u>

Potential impacts associated with light and glare are expected to be less than significant, and are discussed below. The EIR will analyze whether the proposed project would have a substantial, demonstrable negative aesthetic effect or could substantially degrade or obstruct any scenic view or vista now observed from public areas. Photosimulations of the proposed project, including slip orientations, new breakwaters, and other project components, will be included in the EIR.

LIGHT AND GLARE

Building materials would not result in glare affecting other properties. The project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Therefore, mirrored glass would not be used, and the new and remodeled buildings would not result in glare affecting other properties.

A lighting study was prepared to measure background light levels at the site; help determine the impact of project lighting on the environment; and provide general design recommendations, which the project sponsor has incorporated into project design (Horton Lees Brogden Lighting Design, 2003). The study found that most of the existing lighting in the vicinity of the marina is low, typically less than one foot-candle ⁷, and that several existing marina buildings with unshielded, building-mounted light fixtures result in much of the measured light and glare. As stated on the lighting study, exterior lighting levels are approximately 10 footcandles at the exterior entry of the Degaussing Station. As part of project improvements at the new maintenance building, renovated East and West Harbor restrooms, and renovated Degaussing Station and Harbor Office, new lighting and lighting controls would be installed on both the interior and exterior of buildings. As part of the project design, new light fixtures in new and renovated buildings would provide shielded, direct illumination that would prevent glare and light trespass. Time clocks and/or occupancy sensors on all interior building lights would prevent the lighting fixtures from operating when the buildings would be closed and/or unoccupied. No exterior lights are planned for the proposed maintenance building. All interior lighting associated with the renovated

⁷ A foot-candle is a unit of measure to quantify light output, defined as the illumination produced by one candle measured at a distance of one foot.

Degaussing Station would shut off automatically after midnight when office staff would leave the facility. Interior lighting sources could be minimized through the use of curtains or blinds. Exterior lighting, however, would remain on all night for security purposes. Although this would reintroduce a lighting source in an area that is currently dark at night, all lighting would be fully shielded and all illumination directed downward to prevent glare and light trespass, as discussed above. As a result, new lighting associated with the project would not generate obtrusive light or glare substantially impacting other properties.

New lighting fixtures on the floating docks would be located near ground level and provide fully shielded, direct illumination downward onto the pathway. Light levels would be based on the minimum recommended light levels published by the Illumination Engineering Society of America. Given the proposed source shielding, low-mounting height, lighting controls, and illumination level goals, the proposed lighting improvements would result in reduced site light pollution, reduced light trespass, improved user comfort and security, and reduced glare. The project’s proposed lighting scheme would also result in less-than-significant effects on migratory birds and other biological resources (see Section B.8, Biology). No new lighting would be installed along the proposed floating breakwater, immediately adjacent to the Fort Mason Center’s historic Pier One. As new lighting fixtures on floating docks in the East Harbor would be located near ground level and provide fully shielded direct illumination downward onto the docks, lighting impacts to the adjacent Fort Mason Center would be considered less than significant. In addition, in terms of glare from existing building lights, the proposed project would result in less light, glare, and light trespass than under existing conditions, and, as such, light and glare effects would be considered less than significant. Horton Lees Brogden Lighting Design (2003) concluded that project improvements would not result in any loss in the quality of night sky viewing.

In view of the above, the proposed project would not result in a significant lighting or glare impacts. This issue will not be discussed in the EIR.

Cumulative Impacts

The only major project that could have a cumulative effect on light or glare in this area of San Francisco are the planned renovations as part of the Fort Mason Center Long Term Lease. Additional information about the scope and schedule of this project is provided in Section D, below. According to the Long Term Lease Environmental Assessment, there are no specific plans for increased lighting at the Fort Mason Center (NPS, 2003). If new lighting were implemented at Fort Mason Center, however, it would likely be designed to prevent light from spilling onto adjacent properties as required. As a result, cumulative impacts associated with light or glare are not anticipated to be significant.

3) <u>Population</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Induce substantial growth or concentration of population?	_____	<u> X </u>	<u> X </u>
(b) Displace a large number of people (involving either housing or employment)?	_____	<u> X </u>	<u> X </u>
(c) Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	_____	<u> X </u>	<u> X </u>

The project would continue the existing marina operations. City and County of San Francisco employees would continue to staff the Harbor Office and support marina operations and maintenance, with no change in employment. The project would not result in population growth or concentration, or change any demand for housing. Current marina policy does not allow live-aboards or houseboats within the marina. This policy would continue with implementation of the project.

While the overall number of berths would be reduced under the proposed project, the average boat size may increase, potentially leading to an increase in the boater populations, as larger boats can generally hold more people than smaller boats. As described in Section 4, *Transportation/Circulation*, below, an increase in the average length of boats from approximately 32 feet to 38.5 feet would not have a measurable effect on the average number of people on the boats, and as such, larger boats do not directly correspond to substantially more people. Therefore, the proposed project would not induce substantial population growth or concentration of population.

During project construction, existing marina users would be temporarily displaced while improvements occur; however, construction of these improvements would occur in phases, and temporary berths within the marina would be made available to those users directly affected. The long-term reduction in the number of slips is anticipated to occur through natural attrition as users leave the facility, and would not have a substantial effect on boater populations.

Attrition would occur over time as the various phases of construction occur over a period of 36 months. The Recreation and Parks Department would provide sufficient advance notice to existing tenants of when they would be required to vacate their slip. The timing of such vacancies would depend on the construction phase and where the tenant would be relocated. The intent is to minimize the number of tenants who are displaced outside of the San Francisco Marina. The Recreation and Parks Department has developed a plan to take this into account. For example, it is anticipated that the outer west marina would be rebuilt first. Once it is completed, tenants who are asked to vacate would be moved to this location while their berths are reconstructed. This cycle of moving tenants around would be repeated until the entire marina is rebuilt. In the event some boaters do not wish to remain in the marina during construction, it is anticipated they may find other temporary slips in San Francisco or elsewhere in the region, and would have the opportunity to return to the marina once renovations are complete. Displaced boaters with smaller boats that can be hauled by trailer could also access the marina using the boat hoist, once renovated. Additionally, many of the smaller berths belong to long time boaters who do not use the facilities often. It is anticipated that these long time boaters would transfer to other locations over time or sell their boats to newer boaters who would use their boats more frequently and who would move into the slightly larger slips over time. Once the project is completed, and the existing tenants are assigned their new slips, additional and future slips would be offered to persons on the waiting list. As discussed previously, approximately 85 percent of the more than 500 persons on the marina waiting list desire slips thirty feet or longer.

Project improvements could attract some additional visitors to the marina public areas for day use of the boat hoist, hand boat launches, and for use of the improved restrooms, but increased visitation is not expected to be substantial. Use of these facilities would be short term in nature and the hours of operation and public visitation would remain unchanged. The project would shift both office workers and visitors from the existing Harbor Office to the Degaussing Station, to be renovated into a new Harbor Office. However, overall usage levels of this facility are not anticipated to increase when compared with existing use or visitation levels.

The project would not create any new, regional attractions or include facilities that could not be found in similar parks in other city neighborhoods. The project is not adding significant new facilities or substantially expanding existing facilities. The change in the number of marina users under the project would not be substantial nor noticeable given the existing background levels of use. Therefore, the project would not result in significant effects related to population, either through neighborhood growth or displacement, and this topic will not be discussed in the EIR.

Cumulative Impacts

As discussed in Section D, *Cumulative Projects*, the Fort Mason Long Term Lease project would result in an increase of the current 1.6 million annual visitors to about 1.9 million, and increase of about 300,000 people annually. Projects envisioned in the Ferry Access Study, would enhance ferry service to National Park Service (NPS) properties, with potential transit linkages to Fort Mason, though the exact number of visitors is unknown. Although the proposed project may create a minor increase in visitation to the area, which could combine with increased visitation levels associated with Fort Mason, the project’s contribution would be relatively small, and therefore, would not be cumulatively considerable.

4) <u>Transportation/Circulation</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	_____	<u> X </u>	<u> X </u>
(b) Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	_____	<u> X </u>	<u> X </u>
(c) Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	_____	<u> X </u>	<u> X </u>
(d) Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	_____	<u> X </u>	<u> X </u>

The project site is bounded by Marina Boulevard to the south, with north-south streets (from Laguna Street to the east to Lyon Street to the west) intersecting Marina Boulevard. Marina Boulevard, designated as a secondary arterial in the General Plan, is a two-way, east-west street that connects Van Ness Avenue (via Bay and Laguna Streets) with Doyle Drive (which connects with the Golden Gate Bridge – U.S. 101 and Park Presidio Boulevard – State Route 1).

TRAFFIC

Automobile traffic is currently generated by people traveling to and from various uses in the marina area, including boating-related activities, but also other recreational uses (e.g., sightseeing and activities on the Marina Green). Automobile traffic at the marina is also generated by commuters searching for parking on weekdays, overflow parking from special events at Fort Mason on evenings and weekends, as well as parking overflow from adjacent uses. Because changes to the marina would be mainly associated with boating, this analysis focuses primarily on project-related changes to auto trips generated by boaters.

Traffic in the project area currently flows without substantial delays, with acceptable levels of service during typical peak traffic periods.⁸ Activity at the marina is seasonal, with minimal boat traffic generated from November through April, and more (but not frequent) traffic generated during the boating season of May through October, with the greatest concentration of daily trips on weekends during this season.⁹ Unless a boat owner is a recreational fisherman or a racing sailor, most boats do not leave the marina for months at a time, and boats that do leave the marina operate at various times throughout the day.

Although the project area is well-served by public transit, the predominant mode of travel for boaters to and from the marina is by private automobile. As such, it can be reasonably assumed that one boat trip generates approximately one automobile trip in the project vicinity. Other automobile trip-generating activities at the marina include those tenants who come to the marina to work on their boats or use them for recreational purposes (i.e., entertaining, family gatherings, etc.), without the boat physically leaving the harbor.

At project completion, the total number of berths would decrease from 668 to 628. The proposed boat trailer storage area immediately southeast of the boat hoist in the East Harbor parking area, which has a maximum capacity of holding about 24 trailered boats, is assumed to return to use once the renovations to the boat hoist have been completed. For purposes of this assessment of potential traffic impacts, the maximum capacity of the marina at any one time would be 652 boats (i.e., 628 + 24). With 16 fewer boats in the marina, and assuming that all tenants arrive by private automobile, the level of tenant-related automobile traffic is not expected to increase under project conditions, and could decrease with the reduced number of berths, resulting in fewer vehicle trips than under existing conditions. However, this decrease might be offset somewhat with increased day use of the hand boat launches (one each at the East Harbor and West Harbor). Instances of put-in/take-out use by owners of small craft (currently berthed at the marina, but potentially displaced under the proposed project), are not expected to increase the number of tenant-related vehicle trips to/from the marina because those people currently drive to the marina to take their berthed craft onto the Bay. The only change would be that they would take the craft with them attached to their auto.

Not only would the boat trailer storage area have the holding capacity of about 24 trailered boats, this is also the number of boats that could be handled in one day by the boat hoist. The hoist “throughput” capacity (i.e., the number of boats that the hoist could be handled in the course of a day), is assumed to be about 15 minutes to launch and about 15 minutes to pull out, or 2 launches/pull-outs per hour, operating for 12 hours a day in the summer (total 24). Wintertime use of the boat hoist is assumed to be less.

While it is anticipated that overall trips to and from the marina would decrease under project conditions, the intersection of Marina Boulevard / Beach Street / Buchanan Street could experience a minimal increase in traffic volumes due to its proximity to the renovated boat hoist. As described above, the renovated hoist could hold a maximum of 24 trailered boats, thereby generating up to approximately

⁸ Level of service (LOS) is a qualitative description of delays experienced by the average motorist at an intersection (or on a roadway). There are six service levels, from LOS A (little or no delay) to LOS F (extremely long delays); within San Francisco, LOS D or better is considered acceptable. Two recent reports (*Fort Mason Center Long-Term Lease Environmental Assessment*, 2003, and *Presidio Trust Management Plan: Land Use Policies for Area B of the Presidio of San Francisco Final Environmental Impact Statement*, 2001) reported weekday and Saturday peak-hour LOS D or better traffic conditions at the intersections of Marina Boulevard / Fillmore Street, Marina Boulevard – Beach Street / Buchanan Street, Beach Street / Laguna Street, and Marina Boulevard – Doyle Drive / Lyon Street.

⁹ Personal communication, October 13, 2004, Brad Gross, SF Marina Harbormaster, with Jack Hutchison, ESA.

48 new daily one-way automobile trips¹⁰ focused primarily on this intersection as a worst-case scenario. Actual usage of this facility would likely be substantially less. The addition of 48 new daily trips to this intersection, spread over various times of the day, would not be sufficient to degrade the existing LOS B (weekday PM) or LOS C (Saturday midday) to an unacceptable condition. The project effect on this intersection would be less than significant.

The increased average length of the marina's slips (from 32 feet to 38.5 feet) under project conditions would also have a minimal effect on vehicle trip generation because the increased length of boat would not have a measurable effect on the average number of people on the boats. As such, larger boats would not directly correspond to substantially more vehicular trips. Overall, given the prevailing level of traffic-generating activity at the marina, described above, the change in traffic flow conditions in the project area, on a daily basis, or during any one time of the day at area intersections and on area roadways, would be undetectable to the average motorist.

TRANSIT

The use of transit by people who currently use the harbors is assumed to be minimal, and the proposed project would not have a measurable effect on transit ridership. Any new users of the site would most likely be similar to existing users (i.e., pedestrians, bicyclists, boaters, and boaters driving to the site to visit moored boats or launch boats). The project would not have a noticeable effect upon transit services in the project area.

PARKING

On-street parking is provided on the south side of Marina Boulevard only. Parking on Marina Boulevard and on the street network south of the marina area is restricted to two hours between 8:00 a.m. and 6:00 p.m. (Monday through Friday) for nonresidents. Residents (with residential zone M parking permits) have no time limit.

The project site provides a mix of parking for both the general public and for Harbor Permit holders only. Specifically, parking is restricted to Harbor Permit holders only from 10:00 p.m. to 6:00 a.m., and a portion of the spaces (closest to the boats) is restricted to Harbor Permit holders all day on weekends and holidays. There is no physical separation between these two types of parking spaces (i.e., they are separated only by circulation aisles within the parking areas), so the general public and people with Harbor Permits both access the parking spaces from Marina Boulevard via the same driveways.

Under the proposed project, the number of parking spaces at the East or West Harbor parking lots would not change. In addition, the current parking restrictions would remain in effect. However, access control using some type of suitable barrier would be installed to allow boater-only access to designated parking spaces during the hours the marina is closed to the general public (i.e., 10:00 p.m. to 6:00 a.m.). The intent of the improvement is to make enforcement of the above-described parking restrictions less labor-

¹⁰ As used in this analysis, a boat trip is defined as a round trip, which consists of two one-way trips (a trip out of the harbor plus a trip back to the harbor). Correspondingly, there would be two one-way automobile trips (a trip to the harbor plus a trip away from the harbor) generated for each boat trip.

intensive (i.e., staff would spend less time patrolling the parking areas and issuing citations). The gates would be recessed from Marina Boulevard, and the card activation would allow for quick ingress.

Parking demand associated with the Harbor Office may shift from parking areas near the end of Scott Street to the location of the former Degaussing Station, about 1,400 feet to the east, once this facility is renovated for use as a new Harbor Office. As usage levels of this facility is relatively low under existing conditions, and would remain unchanged as part of the proposed project, parking demand is not anticipated to increase as a result.

The project would not make parking in the harbor areas more restrictive, but would modernize the system of enforcement of current parking restrictions. The proposed project would not affect the ability of existing parking facilities to accommodate parking demand. With slightly fewer boats moored in the marina, parking demand at the marina may decrease somewhat.¹¹ Therefore, project impacts on the availability of parking would be less than significant.

PROJECT CONSTRUCTION

During the projected 36-month construction period (20 months in the West Harbor and 16 months in the East Harbor), temporary and intermittent transportation impacts would result from truck movements to and from the project site. Construction would occur on weekdays only, and staging of construction equipment and material would occur in the West Harbor area. Truck movements during peak commute hours would have greater potential to create conflicts than during nonpeak hours because of the greater numbers of vehicles on the streets during the peak hour that would have to maneuver around queued trucks. The intensity and nature of construction activity would vary over the construction period, and the effects of added truck traffic on area roadways would likewise vary. Because truck trips would be spread over the workday, the temporary impact on traffic flow would be less than significant. During project construction, the construction workers would use off-street parking spaces in the harbor areas, which on weekdays are available in ample supply.

While the project's ultimate design and construction bidding process would determine the most feasible construction methods, it is currently anticipated that much of the heavier construction materials to be used at the marina, such as large-diameter rocks for the rip-rap revetments and breakwaters, sections of the floating docks and breakwater, concrete piles and clean, sandy fill for the engineered cap, would be brought in by barge. This construction material delivery method via San Francisco Bay would avoid local roadways and reduce, if not eliminate, potential conflicts with peak-hour traffic in the project vicinity.

Cumulative Construction Impacts

Other major projects that could have cumulative construction effects in this area of San Francisco are the planned renovations to Pier One at Fort Mason, reconstruction of Doyle Drive, and possibly, the Presidio Trust Management Plan (PTMP) and the Muni E-line Extension to, and perhaps through, Fort Mason.

¹¹ As described under Traffic, above, instances of put-in/take-out use by owners of small craft displaced under the proposed project are not expected to increase the number of tenant-related vehicle trips to/from the marina (nor the related parking demand) because those people currently drive to the marina to take their berthed craft onto the Bay. The only change would be that they would take the craft with them attached to their auto. In addition, the increased average length of the marina's slips under project conditions would have a minimal effect on vehicle trip generation (and related parking demand) because the increased length of boat would not be enough to have a measurable effect on the average number of people on the boats.

Additional information about the scope and schedule of these projects is provided in Section D, below. According to the NPS, renovations to Pier One would occur sometime after 2008 around the same time that proposed improvements to the marina's East Harbor would occur.¹² Some of the Pier One renovation activities as well as the proposed construction in the East Harbor, such as the floating breakwater, pile driving, etc. could have overlapping construction schedules, which would cause a minor short-term cumulative impact related to the visitor experience at Fort Mason Center (FMC). This impact could be mitigated with careful project planning between the FMC and the Department of Public Works (DPW), as well as proper notification of all FMC resident organizations, businesses, employees, and visitors. However, it may be desirable to construct both projects simultaneously, thereby potentially reducing the duration of the overall construction period. This too would require project planning between the FMC and DPW.

The PTMP is intended to provide an updated land use policy framework for the inland portions of the Presidio, but does not constitute a commitment to any specific development projects, or construction schedules, and any projects or follow-on plans must be approved separately by the Trust Board, and will themselves be subject to additional environmental review before their implementation. Therefore, it would be speculative to evaluate the cumulative construction effects of the PTMP at this time.

The Doyle Drive reconstruction project would not begin until 2008 at the earliest, by which time the proposed improvements in the West Harbor would have been completed (by mid-2007). Therefore, it is unlikely that construction overlap would occur in the vicinity of the West Harbor, generally avoiding any cumulative construction-related impacts in this location. However, even if the construction schedule for the West Harbor were to slip and overlap with the Doyle Drive reconstruction, the short-term cumulative impact could be lessened with careful project planning between the FMC and DPW. Construction in the East Harbor would not begin until late 2007, and last for approximately 16 months. Construction in the East Harbor could combine with construction efforts related to Doyle Drive reconstruction to generate cumulative traffic impacts. However, the two construction areas would be about one mile apart, thereby reducing the potential for cumulative construction-related impacts. In addition, most of the heavy construction materials and equipment for the marina would be brought in by barge, avoiding local roadways and further reducing potential conflict with Doyle Drive reconstruction efforts.

Construction of the Muni E-line Extension project, if approved and funded, would not likely begin construction until well after completion of the proposed improvements to the East Harbor. As a result, no cumulative construction impacts are anticipated as result of this project combined with the proposed project.

Cumulative Traffic Impacts

Other major projects that could have a cumulative effect on traffic conditions in this area of San Francisco are the planned renovations to Pier One as part of the Fort Mason Center Long Term Lease, reconstruction of Doyle Drive, the PTMP, and Muni E-line extension. Additional information about the scope and schedule of these projects is provided in Section D, below.

¹² Personal communication, October 21, 2004, Karen Cantwell, NPS, with Brad Brewster, ESA.

The traffic analysis for Long Term Lease EA indicated that the two study intersections closest to the Marina Renovation project site (i.e., Beach/Laguna and Marina/Buchanan/Beach) would not experience a change in the traffic levels of service with the Pier One project, compared to existing year 2003 conditions (NPS, 2003). These intersections would continue to operate at LOS C and B, respectively, after completion of the Pier One renovations. Trips generated by the Pier One project combined with the trips generated by the proposed project would not result in a substantial change in the level of service at these study intersections, which would continue to operate at LOS C and B under cumulative conditions.

The Doyle Drive project involves the reconstruction of the Doyle Drive viaduct to address seismic and structural deficiencies. It would also enhance the aesthetics of the facility and its interaction with the Presidio. The project is not intended to provide additional traffic capacity and for that reason would not result in increased traffic in the vicinity of the marina.

The PTMP calls for an increase in the total land uses and the amount of employee and visitor activity at the Presidio. It would generate increased traffic on the roadways in the vicinity of the marina. However, the traffic analysis for the PTMP Environmental Impact Study indicates that the two study intersections that are closest to the Marina Renovation project site (i.e., the intersection of Doyle Drive with Marina Boulevard and Lyon Street and the intersection of Marina Boulevard with Lyon and Mason Streets) would not experience a change in the traffic levels of service with the PTMP, compared to existing year 2000 conditions (Wilbur Smith Associates, 2002). Trips generated by the PTMP combined with the trips generated by the proposed project would not result in a substantial change in the level of service at these study intersections.

The Muni E-line extension, if completed to the western edge of the Fort Mason Center as currently envisioned, would provide an additional alternative to the private automobile in the project vicinity. This public transit project would likely decrease use of the private automobile in the project area as people may switch from private automobile use to public transit, and would therefore not add a substantial number of vehicular trips to those generated by the proposed project (if any). One of the turnaround concepts envisioned in Phase 1 (Jones Street to Fort Mason) of the Muni E-line Extension Draft Feasibility Study would utilize a small portion of the project site immediately south from Marina Boulevard and within the existing East Harbor parking lot (Wilbur Smith Associates, 2004). This alternative could displace about 30 parking spaces in this area, but would have no direct conflicts with the proposed trailered boat storage area or the renovated boat hoist, which is located farther to the north. As design efforts are ongoing, and environmental review of this project is yet to begin, there are future opportunities to reduce any potential traffic and parking impacts that may arise among the marina, Fort Mason, and Muni operations in this vicinity. Phase 2 of the E-line Extension project (Fort Mason to the Presidio) envisions an optional alignment along Marina Boulevard, which would cross the vehicular entrances to the marina at the following signalized intersections: Marina Boulevard / Beach Street / Buchanan Street, Marina Boulevard / Scott Street, and Marina Boulevard / Lyon Street. As the proposed project is not expected to substantially increase the number of automobile trips in the area, and the introduction of public transit in the area would likely reduce automobile trips, there would not be a cumulative traffic impact associated with the E-Line Extension.

Cumulative Transit Impacts

Other major projects that could have a cumulative effect on transit in this area of San Francisco are the Fort Mason Center Long Term Lease, the Presidio Trust Management Plan (PTMP), and the Muni E-line extension. The analyses for the FMC Long Term Lease EA and PTMP EIS identified no adverse effects on transit operations. The Muni E-line extension would improve transit service in the area. As described above, the Marina Renovation project would not have a noticeable effect upon transit services in the project area, and the cumulative effect on transit service would be less than significant.

Cumulative Parking Impacts

A major project that could have a cumulative effect on parking conditions in this area of San Francisco is the Fort Mason Center Long Term Lease (with its potential implementation of parking management, including paid parking). The analysis for the FMC Long Term Lease EA indicated that, depending on the structure of the fees, imposition of parking fees at FMC would displace parkers who choose to not pay (especially people who are not destined for a FMC facility) to areas with free parking. Because of the proximity of the FMC to the marina, parkers could seek parking spaces at the marina to avoid the pay lot at the FMC. The cumulative effect on parking conditions could be potentially significant if it caused large numbers of people to search for free parking at the marina, creating traffic congestion at local intersections. As described above, however, the Marina Renovation project would not affect the ability of existing parking facilities to accommodate parking demand, and therefore, the project’s contribution to a potentially significant cumulative parking impact would be less than significant.

5) <u>Noise</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Increase substantially the ambient noise levels for adjoining areas?	_____	<u> X </u>	<u> X </u>
(b) Violate Title 24 Noise Insulation Standards, if applicable?	_____	<u> X </u>	<u> X </u>
(c) Be substantially impacted by existing noise levels?	_____	<u> X </u>	<u> X </u>

This Initial Study section discusses potential impacts associated with project-related traffic noise, operational noise, and construction noise. Noise levels are expected to be less than significant, as described below, and will not be discussed in the EIR.

NOISE SETTING

The urban setting of the project area includes numerous potential sources of noise, dominated by vehicular traffic on Marina Boulevard. The nearest noise-sensitive uses are residential uses located approximately 200 to 800 feet south of the project site (from the water basins) along Marina Boulevard. Pier One and Building A at the Fort Mason Center are immediately to the east of the East Harbor. Pier One is currently vacant, while Building A contains the Museum of Folk Art, the San Francisco Museum of Modern Art (SFMOMA) rental gallery, the Fort Mason Foundation offices, and a conference center. The uses at Building A would be considered moderately sensitive to noise, particularly during the day. Residential uses are considered most sensitive to noise, particularly at night, due to the lower background

noise levels and the sensitive nature of activities that take place in residences (such as relaxation and sleep). Other uses in the vicinity of the site, such as commercial uses, are considered less sensitive to noise. It should be noted that noise levels at receptors near the project site would vary, depending on their distance from the source, wind direction, and presence or absence of barriers to noise transmission between the source and the receptor.

Title 24 relates to noise insulation for residential uses, and, as such, is not applicable to this project.

TRAFFIC NOISE

Generally, traffic must double in volume to produce a noticeable increase in noise levels. The project would not cause a doubling in traffic volumes; therefore, traffic noise would not be significant.

OPERATIONAL NOISE

The proposed project would continue existing marina operations and related activities that have been ongoing for many years. Although facilities would be improved (a renovated boat hoist, renovated restrooms, a new maintenance shop, oily water and sewage pumpout facilities, a change in location of the Harbor Office, and new hand boat launches), noises associated with these improvements would be similar to those associated with existing conditions. There would be an overall decrease in the number of boats berthed at the marina, which could tend to reduce the amount of noise in the harbors compared to existing conditions. The project is expected to retain the current percentages of approximately 63 percent sailboats and 37 percent powerboats. Similar to traffic noise, boat traffic must double to produce a noticeable increase in noise levels. With fewer boat berths overall (the overall number of boat berths would be reduced from 668 to 628 plus 24 trailered boat storage spaces) total boat trips would not double, and in fact may decline as a result of the project. Because the project would not cause a doubling of boat traffic; the noise from boat traffic would not be significant. A larger average berth size in the renovated marina does not necessarily mean there would be an influx of larger boats; however, even if this were the case, the power of auxiliary motors for large sail boats is about the same (25 to 30 horsepower). Moreover, larger power boats often use quieter, four-stroke inboard engines, rather than the louder, two-stroke outboard engines typical of smaller boats.

The proposed project would include mechanical equipment (i.e., the renovated boat hoist on the East Harbor, perhaps an HVAC system at the Harbor Office) that could produce new operational noise. These operations would be subject to the San Francisco Noise Ordinance, Article 29 of the San Francisco Police Code. Compliance with Article 29, Section 2909 [Fixed Noise Sources], would restrict noise from the renovated boat hoist, and any HVAC system. Since the noise would comply with the Noise Ordinance and only occur periodically (a maximum of 24 boat trailers would be put in and removed each day), this would be a less than significant operational impact.

CONSTRUCTION NOISE

Construction of the proposed project would temporarily increase noise in the site vicinity during periods throughout the approximately 36-month project construction period. All construction activities would be conducted in compliance with the San Francisco Noise Ordinance (Article 29 of the San Francisco Police

Code). Sections 2907 and 2908 of the ordinance regulate construction equipment and construction work at night. The Noise Ordinance requires that: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 decibels (as measured in dBA¹³) at a distance of 100 feet from the source; (2) impact tools must have intake and exhaust mufflers that are approved by the Director of the Department of Public Works to best accomplish maximum noise reduction; and (3) if the noise from the construction work would exceed the ambient noise levels at the property line of the site by 5 dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m., unless the Director of the Department of Public Works authorizes a special permit for conducting the work during that period. Proposed project work would comply with the Noise Ordinance.

Pile Driving Construction Impacts

Pile driving associated with the reconstruction of the East and West Harbor floating docks and breakwaters is expected to be the noisiest activity associated with project construction. Pile driving would occur intermittently over the 36-month construction period. Pile driving activities specifically for the East Harbor breakwater would take approximately one month or about 3 percent of the 36-month construction period.¹⁴ The noise from the pile driver would be most noticeable along the frontage of the construction areas. During impact, noise from pile driving can be about 90 to 95 dBA at 100 feet, and would diminish with distance. Pile driving activities associated with the construction of the East Harbor breakwater would be between 10 to 20 feet from Pier One at the Fort Mason Center. This building is currently unoccupied and used for storage, with future plans to renovate this facility as a cultural events venue (see Section D, Cumulative Projects, for more information about project plans for Pier One).¹⁵ Pile driving for the East Harbor Breakwater would be approximately 200 to 700 feet away from Building A at Fort Mason, which houses Green's Restaurant, the Museum of Folk Art, the San Francisco Museum of Modern Art (SFMOMA) rental gallery, the Fort Mason Foundation offices, and a conference center. Building A operates from 7a.m. to midnight seven days a week.¹⁶ Pile driving activities associated with the construction of the floating docks in the East Harbor would be approximately 200 to 1,000 feet from Pier One and Building A at Fort Mason.

Other uses, such as the existing recreational uses on the project site, and residential uses on the south side of Marina Boulevard, would also be exposed to pile driving noise during the construction period. Recreational uses at the project site would vary with distance from the noise source. Residences along Marina Boulevard would be about 200 to 800 feet away from construction-related noise sources, primarily in the West Harbor area.

To reduce potential impacts associated with noise generated from project construction, the project sponsor would require contractors to use construction equipment with state-of-the-art noise shielding and muffling devices. The project sponsor would also require that contractors schedule construction activities for times of the day that would minimize disturbance to neighbors (see Mitigation Measure 1, page 71). Due to the

¹³ A dBA is a unit of measure for sound that uses an A-weighted scale to simulate the response of the human ear to various sound frequencies.

¹⁴ Personal Communication with Dilip Trevedi, Moffatt & Nichol Engineering, with Brad Brewster, Environmental Science Associates, March 14, 2005.

¹⁵ Personal Communication with Kathleen Cruise, Director of Operations, Fort Mason Foundation, with Brad Brewster, Environmental Science Associates, November 5, 2004.

¹⁶ Ibid.

temporary nature of construction and implementation of the mitigation measures included in the project, noise impacts associated with project construction are expected to be less than significant.

Pile driving associated with the project would produce vibrations in addition to noise. Structures within 25 feet of extensive pile driving could sustain damage. Vibrations from pile driving can also cause damage to buildings in poor condition as far as 100 feet from the source. Pier One is an historic building with known seismic strength deficiencies, and would be located between 10 to 20 feet from proposed pile driving activities for the East Harbor breakwater. Vibration impacts from pile driving on this fragile historic resource will be discussed in the Geology and Soils Section of the EIR.

CUMULATIVE NOISE IMPACT

Other major projects that could have a cumulative effect on noise in this area are the planned renovations to Pier One as part of the Fort Mason Center Long Term Lease, reconstruction of Doyle Drive, the Presidio Trust Management Plan (PTMP), and Muni E-line extension. Additional information about the scope and schedule of these projects is provided in Section D, below.

All construction projects in the project vicinity would be subject to the requirements of the San Francisco Noise Ordinance, would be temporary in nature, and therefore would not be cumulatively considerable. To reduce the duration of construction-related noise adjacent to and within Fort Mason, however, the San Francisco Public Works Department and Fort Mason would coordinate their construction schedules for the East Harbor breakwater and the proposed renovations to Pier One, as described in Mitigation Measure 1, page 71.

6) <u>Air Quality/Climate</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	_____	<u> X </u>	<u> X </u>
(b) Expose sensitive receptors to substantial pollutant concentrations?	_____	<u> X </u>	<u> X </u>
(c) Create objectionable odors affecting a substantial number of people?	_____	<u> X </u>	<u> X </u>
(d) Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	_____	<u> X </u>	<u> X </u>

AIR QUALITY

The proposed project is located within the Bay Area Air Quality Management District (BAAQMD). Since most of San Francisco’s topography is below 200 feet, marine air is able to easily flow across most of the city making its climate cool and windy. Pollutant emissions in San Francisco are primarily from motor vehicle congestion. Localized pollutants, such as carbon monoxide from vehicles, can build up in “urban canyons”, although the winds in San Francisco are generally strong enough to carry the pollutants away

from the area before they can accumulate (BAAQMD 1998). Winds within the project area are generally from west-southwest, west, and west-northwest.

Regulation of air pollution is achieved through both Federal and State ambient air quality standards and limits for individual sources of air pollutants. An “ambient air quality standard” represents the level of air pollutant in the outdoor (ambient) air necessary to protect public health. As required by the federal Clean Air Act, the United States Environmental Protection Agency (U.S. EPA) has identified criteria pollutants and established National Ambient Air Quality Standards (NAAQS or national standards) to protect public health and welfare. NAAQS have been established for ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter less than 10 and 2.5 microns (PM₁₀ and PM_{2.5}), and lead (Pb). The California Air Resource Board (CARB) has adopted more stringent ambient air quality standards for most of the criteria air pollutants.

Toxic Air Contaminants

Toxic air contaminants (TACs) are pollutants that are associated with acute, chronic, or carcinogenic health effects but for which no ambient air quality standard has been established. In August of 1998, the CARB identified particulate emissions from diesel-fueled engines (diesel particulate matter, or DPM) as a TAC. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* and the *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The documents present proposals to reduce diesel particulate emissions, with the goal to reduce emissions and the associated health risk by 75 percent in 2010 and by 85 percent in 2020. The program aims to require the use of state-of-the-art catalyzed diesel particulate filters and ultra low sulfur diesel fuel for mobile sources. Reducing diesel particulates will also provide a dramatic reduction in PM_{2.5}, because diesel particulates are in the size category of PM_{2.5} and generally diesel particulates are a large component of the PM_{2.5} particulate category. In general, mobile sources contribute more significantly to health risks in the project area than stationary sources as there are no major stationary sources in the project area.

California Standards for Diesel Fuel

The California Diesel Fuel Regulations currently allow the sale and distribution of diesel fuel with a sulfur content of 500 parts per million (ppm). CARB has implemented provisions that require a decrease in the sulfur concentration of diesel fuel starting June 2006. In accordance with the phase-in schedule, no person shall sell, offer for sale, supply or offer for supply any diesel fuel having a sulfur content exceeding 15 ppm by weight in California after June 2006. Like automobile vehicle engine emissions, boat engines that use diesel fuel are expected to become less polluting in future years as a result of the decrease in the sulfur content.

Construction-Related Impacts

During project construction, the operation of equipment would emit hydrocarbons, oxides of nitrogen (NO_x), CO, and PM₁₀ (consisting of windblown dust and diesel particulate). The BAAQMD’s approach to analysis of construction impacts is to emphasize implementation of effective and comprehensive control measures rather than detailed quantification of emissions (BAAQMD, 1999). BAAQMD has identified a set of mitigation measures for emissions generated from construction activities. These

measures, identified as Mitigation Measure 2 (page 71), would be implemented for the proposed project as appropriate. Because the proposed project would include the proposed mitigation measures, it should not cause significant construction-related air quality effects and therefore construction emissions would be less than significant .

Operation-Related Impacts

Motor Vehicles and Truck Emissions

The BAAQMD has established thresholds for projects requiring detailed air quality analysis. For example, the BAAQMD has established a threshold for projects that could be capable of producing air quality problems due to vehicular emissions. The BAAQMD “generally does not recommend a detailed air quality analysis for projects generating less than 2,000 vehicle trips per day, unless warranted by the specific nature of the project or project setting” (BAAQMD, 1999). The proposed project would generate substantially fewer than 2,000 daily vehicle trips, and potentially no new trips at all. Vehicular trips may be reduced under the proposed project, as described in the Section 4, *Transportation/Circulation*. Therefore, the proposed project would not exceed this minimum standard, and as a result, no significant air quality impacts due to vehicular emissions are expected as a result of the proposed project.

Marine Vessel Emissions

In general, there are three categories of sailboats at the marina; smaller sailboats (less than 40 feet) with either two-stroke gas or two-stroke diesel-powered auxiliary engines, or larger sailboats (greater than 40 feet) with inboard four-stroke diesel engines. There are also three categories of powerboats at the marina: smaller fishing type powerboats (less than 25 feet) typically have two-stroke gas-powered outboard engines, mid-size powerboats (26 to 39 feet) typically have four stroke gas-powered inboard engines, while larger powerboats (greater than 40 feet) typically have four-stroke diesel-powered inboard engines.¹⁷ Diesel engines provide greater lower-end torque than gas engines, and are needed for maneuvering. However, diesel engines also have the potential for greater particulate emissions than gas-powered boats, although gas engines also emit particulates. Given that the number of slips greater than 40 feet long would increase compared to current conditions, it can be assumed there would be a commensurate increase in the number of larger, diesel-powered craft in the marina. Table 3 on the following page identifies the assumptions utilized in an air emissions analysis conducted to provide information about existing and proposed numbers of boats by size, type, fuel type, and assumed trips by boat class on a peak day. Assumptions used in the emissions calculation are provided in the worksheets in Appendix A.

As shown in Table 3, it is estimated that the total number of smaller (less than 40 feet) sailboats (both gas and diesel combined) would decrease from about 164 to 112 (difference of about 52 boats), while larger (greater than 40 feet) diesel-powered sailboats would increase from about 94 to 173 (difference of about 79 boats). Smaller (less than 25 feet) gas-powered powerboats would decrease from about 94 to 30 (difference of about 64 boats), while the number of mid-range (26–39 feet) gas-powered powerboats would increase from about 98 to 125 (difference of about 27 boats). Finally, the number of larger (greater than 40 feet) diesel-powered powerboats would increase from about 55 to 101 (difference of about 46 boats).

¹⁷ Personal communication with Brad Gross, San Francisco Marina Harbormaster, with Cynthia Wren, Environmental Science Associates, October 13, 2004.

**TABLE 3
MARINE VESSEL OPERATING CONDITIONS
Existing vs. Proposed Conditions**

Existing (2005)	Fuel type/engine type	No. of boats	Assumed trips per peak day
Sailboat (<40 ft)	gas/2-stroke	164	4.9
Sailboat (<40 ft)	diesel/2-stroke	163	4.9
Sailboat (>40 ft)	diesel/4-stroke	94	2.8
Powerboat (<25 ft)	gas/2-stroke	94	2.8
Powerboat (26–39 ft)	gas/4-stroke	98	3
Powerboat (> 40 ft)	diesel/4-stroke	55	1.6
	(247 total powerboat)	668 Total	20.0
Proposed (2010)			
Sailboat (<40 ft)	gas/2-stroke	112	3.4
Sailboat (<40 ft)	diesel/2-stroke	111	3.4
Sailboat (>40 ft)	diesel/4-stroke	173	5.4
Powerboat (<25 ft)	gas/2-stroke	30*	1
Powerboat (26–39 ft)	gas/4-stroke	125	3.8
Powerboat (> 40 ft)	diesel/4-stroke	101	3
	(257* total powerboat)	652 Total*	20.0

*includes an additional 24 power boats stored on trailers at the site.

“<” means less than, and “>” means greater than.

Given these proposed changes, air pollutant emissions from marine vessels have been estimated using CARB’s emission inventory for marine craft exhaust emissions (CARB, July 1998) and the results are shown in Table 4, below.

**TABLE 4
EXISTING and PROPOSED OPERATIONAL EMISSIONS**

Pollutant	Existing Setting Maritime Emissions (2005) (lbs/day)	Proposed Project Maritime Emissions (2010) (lbs/day)	Difference as compared to Existing Setting (lbs/day)	BAAQMD Significance Thresholds (lbs/day)^a	Exceed Significance Threshold?
ROG	44.2	18.8	-25.5	80	No
NOx	4.0	9.7	+5.7	80	No
PM ₁₀	3.4	1.0	-2.4	80	No

a BAAQMD CEQA Guide for Assessing and Mitigating Air Quality Impacts (1999). Threshold considers item “b” below.

b Difference equals existing conditions minus proposed conditions (assuming 20 boats on a peak day).

As shown in Table 4, on the preceding page, air emissions are expected to slightly increase for NO_x, primarily a result of the greater number of larger (greater than 40 feet) diesel-powered powerboats that could operate at the marina by 2010. A decrease in reactive organic gases (ROG) is expected as a result of fewer gasoline engines that could operate at the marina. There would be a slight decrease in PM₁₀ expected from the proposed project, also a result of fewer gasoline engines, as well as fewer 2-stroke engines (both gas and diesel) that could operate at the Marina.¹⁸ As indicated in Table 4, emissions from the proposed project would not exceed current BAAQMD thresholds. Therefore, the marina emissions from the proposed project would be less than significant.

The emissions were calculated with the assumption of 20 boat trips per day, which represents a peak day operating scenario for the marina.¹⁹ Actual boat trip activity is seasonal at the marina, averaging 5 boat trips per week during the winter months (November to April) and as much as 17 boat trips per day in the summer months (May to October). As a result, typical daily emissions are expected to be less than those shown on Table 4. In addition, the air quality analysis used the same emission factors for both the existing setting (2005) and the proposed project timeframe (2010), which did not take into consideration anticipated engine and fuel improvements that should further reduce future emissions between 2005 and 2010. Like automobile vehicle emissions, boat engines are expected to become less polluting in future years as a result of the decrease in sulfur content of diesel fuel, which will be implemented in 2006. As a result, typical daily emissions by 2010 are expected to be lower than those shown on Table 4.

As described above, CARB has declared that diesel particulate matter (DPM) is a toxic air contaminant (TAC). Since diesel particulate emissions would decrease with the project, the impact from DPM would be less than significant. The CARB regulations for diesel engines also assure that PM_{2.5} levels will be reduced in the future compared to existing levels, even with some increase in the use of larger diesel engines.

Finally, the analysis did not include emissions from small engines associated with the renovated pump facility as the current operations would be generally the same as under future conditions, and would be electric, which have no air emissions. The renovated boat hoist would be also operated via electric winch, and would also have no air emissions associated with it.

SHADOW AND WIND

Planning Code Section 295 (Proposition K) generally prohibits new shadow from encroaching upon Recreation and Parks properties. However, buildings less than 40 feet in height and/or constructed on Recreation and Park property for recreational and park-related uses are exempt from Proposition K. The proposed project would not involve construction or expansion of any building greater than 40 feet in height. The maximum height of the proposed maintenance building would be about 18 feet. Moreover, the proposed structure would be constructed on property owned by the Recreation and Parks Department

¹⁸ The increase in the number of diesel engines at the marina under the proposed project (+73) would be offset by an even greater reduction in the number of gasoline engines (-89), as well as reduction of the dirtier 2-stroke engines, both gas and diesel (-168), resulting in lower overall ROG and PM₁₀ emissions.

¹⁹ Personal communication with Brad Gross, San Francisco Marina Harbormaster, with Cynthia Wren, Environmental Science Associates, October 13, 2004.

for recreational and park-related purposes, As such, the project would not be subject to Proposition K and therefore would not create a significant impact with regard to shadows.

Wind impacts are generally caused by large buildings that extend substantially above their surroundings, and by buildings oriented such that a large wall catches a prevailing wind. Since all new and renovated buildings would be one story tall, the proposed project would not result in adverse effects on ground-level winds.

ODOR

The BAAQMD implements Regulation 7 to control odorous substances. The BAAQMD has not listed marina operations among those known to emit objectionable odors. According to the Public Information Department at the BAAQMD, the marina area of San Francisco has no history of odor complaints (Taylor, 2003). The project does include installation of an oily water and sewage pumpout facility and refurbishment of two sewage pumpout facilities. This type of facility can result in odorous emissions, but it is expected that refurbishment of this equipment will result in a decrease in potential odor emissions as compared to existing conditions. Also, the harbor area can have typical seaside smells or odors: these are generally not considered objectionable. The project would not change the buffer distances between any existing land uses and sensitive receptors, nor would it introduce new odor sources to the area or exacerbate existing sources. Thus, the proposed project would not have any significant odor impacts.

Cumulative Impacts

The projects discussed in *Section D. Cumulative Projects* could result in temporary impacts to air quality as a result of construction activities. The construction emissions from the proposed project when combined with the construction emissions from the other projects would be reduced to a less-than-significant level with implementation of the standard BAAQMD mitigation measures, which would also apply to the other projects in the vicinity. As a result, cumulative impacts associated with construction emissions would be less than significant. The operational emissions from the proposed project would be well below the BAAQMD significance thresholds for ROG, NOx, and PM₁₀, and therefore, would not have a cumulatively considerable effect on operational emissions when combined with the operational emissions from the other proposed projects in the area. As a result, cumulative impacts associated with operational emissions would be less than significant.

7) <u>Utilities/Public Services</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Breach published national, state or local standards relating to solid waste or litter control?	_____	_____ <u>X</u> _____	_____
(b) Extend a sewer trunk line with capacity to serve new development?	_____	_____ <u>X</u> _____	_____
(c) Substantially increase demand for schools, recreation or other public facilities?	_____	_____ <u>X</u> _____	_____
(d) Require major expansion of power, water, or communications facilities?	_____	_____ <u>X</u> _____	_____ <u>X</u> _____

Utilities and public services are already provided in the project area. The proposed project includes upgraded electrical and water services to the new floating docks, which would incrementally increase demand for and use of public services and utilities on the site. However, this increase would not exceed levels of service expected and already provided in the area. Thus, the proposed project is not expected to have a measurable impact on public services or utilities.

8) <u>Biology</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	_____	<u> X </u>	<u> X </u>
(b) Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	_____	<u> X </u>	<u> X </u>
(c) Require removal of substantial numbers of mature, scenic trees?	_____	<u> X </u>	<u> X </u>

A biological resources report was prepared for the project, and the discussion below is a summary of the analysis presented in that report (Environmental Science Associates, 2003). Ten special status species were identified as potentially occurring in or near the project site (see Table 5 on the following page). This list comprises eight special status animals (including four fish species, two bird species, and two mammal species) and two plants. This list was compiled based on an analysis of previous studies conducted in the project region concerning the presence of special status plant and animal species; review of the California Natural Diversity Database (CNDDDB); consultation with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG); review of pertinent scientific literature about the sensitive species of concern; review of the most recent Notice of Review for federally listed and candidate animals; review of CDFG’s most recent list of special status animals and plants (which also includes federally listed and candidate plants); and review of California Native Plant Society (CNPS) literature.

Table 5 also presents the current federal and state listing status and, in the case of plants, the CNPS status for the special status species identified. Table 5 does not include all species with the potential to occur within the San Francisco North quadrangle, only those that could be reasonably expected to occur in the local project vicinity.

The publication *The Effects of Marina & Boating Activity upon Tidal Waterways*, (Klein, 1997) is intended to assist planners in siting new marina projects and describes potential impacts to sensitive tidal waterway resources. The report recommends that marinas, launching ramps, and other marina facilities be located in deep water (greater than 7.2 feet deep) and adjacent to large water bodies (greater than 1,200 feet wide), such as the current marina location, so that they do not impact small tidal waterways. The marina site meets or exceeds this report’s resource protection recommendations. Virtually none of the sensitive aquatic features identified by Klein, including eelgrass beds, cordgrass habitat and other emergent wetlands, or small tidal creeks occur in the immediate project vicinity. The nearest wetland habitat to the project area are the restored tidal marshes at Crissy Field, about one mile west from the entrance of the West Harbor. These tidal resources are located far enough away from any proposed improvements to the

**TABLE 5
SPECIAL STATUS SPECIES
WITH GREATEST POTENTIAL TO OCCUR IN THE PROJECT AREA**

Common Name <i>Scientific Name</i>	Listing Status	General Habitat	Potential for Species Occurrence Within the Project Area	Period of Occurrence (Animals) or Identification (Plants)
SPECIES THAT ARE LISTED, PROPOSED, OR CANDIDATES FOR LISTING				
ANIMALS				
<i>Fish</i>				
Steelhead, Central California Coast ESU <i>Oncorhynchus mykiss</i>	FT	Drainages of San Francisco and San Pablo bays, central California coastal rivers	Moderate Potential. The marina is within the designated ESU; migrating individuals may occasionally move through Bay waters in and near the marina.	November– May
Steelhead, Central Valley ESU <i>Oncorhynchus mykiss</i>	FT	Drainages of San Francisco, Central Valley, and San Pablo bays.	Moderate Potential. The marina is within the designated ESU; migrating individuals may occasionally move through Bay waters in and near the marina.	November– May
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Coho salmon, Central California Coast ESU <i>Oncorhynchus kisutch</i>	FT/CE	Central and northern California coastal rivers and streams	Moderate Potential. The marina is within the designated ESU; migrating individuals may occasionally move through Bay waters in and near the marina.	November– January
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Chinook salmon, Central Valley (Sacramento) winter-run ESU <i>Oncorhynchus tshawytscha</i>	FE/CE	Migrates through Bay waters. Adults breed in Central Valley rivers.	Moderate Potential. The marina is within the designated ESU; migrating individuals may occasionally move through Bay waters in and near the marina.	December– July
Chinook salmon, Central Valley spring-run ESU <i>Oncorhynchus tshawytscha</i>	FT/CT	Migrates through Bay waters. Adults breed in Central Valley rivers.	Moderate Potential. The marina is within the designated ESU; migrating individuals may occasionally move through Bay waters in and near the marina.	March– September
Chinook salmon, Central Valley fall- and late-fall-run ESU <i>Oncorhynchus tshawytscha</i>	FC/CSC	Migrates through Bay waters. Adults breed in Central Valley rivers.	Moderate Potential. The marina is within the designated ESU; migrating individuals may occasionally move through Bay waters in and near the marina.	June– December
<i>Birds</i>				
California brown pelican <i>Pelecanus occidentalis</i>	FE/CE	Forages in open water, breeds in colonies on islands without mammal predators	Absent (nesting). Frequent visitor in shore areas of Marina, feeds in Bay. No nesting habitat present.	March– June (nesting); Present year-round
Plants				
Marsh sandwort <i>Arenaria paludicola</i>	FE/CE/1B	Marsh and swamps, growing through dense mats of <i>Typha</i> and <i>Juncus</i> , etc.	Absent. No habitat present in the project area.	March– May

TABLE 5 (Continued)
SPECIAL STATUS SPECIES
WITH GREATEST POTENTIAL TO OCCUR IN THE PROJECT AREA

Common Name <i>Scientific Name</i>	Listing Status	General Habitat	Potential for Species Occurrence Within the Project Area	Period of Occurrence (Animals) or Identification (Plants)
FEDERAL OR STATE SPECIES OF SPECIAL CONCERN				
ANIMALS				
<i>Fish</i>				
Pacific Herring <i>Clupea harengus</i>	MSFCMA	Shallow intertidal waters of bays, estuaries, and coastlines; including rocks, jetties, sandy beaches, and pilings	High Potential. Known spawning population's at north end of Golden Gate Bridge and San Francisco waterfront.	October– March
<i>Birds</i>				
Double-crested cormorant <i>Phalacrocorax auritus</i>	CSC	Nests along coast on sequestered islets, usually on sloping ground or in tall trees along lake margins	Absent (nesting). Described in 1988 1/10 mile east of site (CNDDDB, 2003). No nesting habitat present.	March– June (nesting); present year-round
<i>Mammals</i>				
Harbor seal <i>Phoca vitulina</i>	MMPA	Littoral in nature, colonies found on protected tidal rocks, reefs, and breakwaters	Moderate Potential. Populations observed east of project area, Pier 39, and Seal Rock. Incidental within project area.	Year-round
California sea lion <i>Zalophus californianus</i>	MMPA	Littoral in nature, colonies found on protected tidal rocks, reefs, and breakwaters	Moderate Potential. Populations observed east of project area, Pier 39, and Seal Rock. Incidental within project area.	Year-round
PLANTS				
San Francisco gumplant <i>Grindelia hirsutula</i> var. <i>maritima</i>	FSC/--/1B	Coastal bluff scrub, coastal scrub, valley and foothill grassland; slopes with sandy or serpentinite soils	Absent. Habitat for this species does not occur in the project area.	March– May

STATUS CODES:

FEDERAL: (U.S. Fish and Wildlife Service)

FE = Listed as endangered (in danger of extinction) by the federal government

FT = Listed as threatened (likely to become endangered within the foreseeable future) by the federal government

FP = Proposed for listing as endangered or threatened

FC = Candidate to become a *proposed* species

FSC = Federal species of concern. May be endangered or threatened, but not enough biological information has been gathered to support listing at this time.

MMPA= Protection under the Marine Mammal Protection Act

MSFCMA=Protection under Magnuson-Stevens Fishery Conservation and Management Act

STATE: (California Department of Fish and Game)

CE = Listed as endangered by the State of California

CT = Listed as threatened by the State of California

CR = Listed as rare by the State of California (plants only)

CSC = California species of special concern

California Native Plant Society

List 1A=Plants presumed extinct in California

List 1B=Plants rare, threatened, or endangered in California and elsewhere

SOURCES: CNDDDB, 2003; CNPS, 2003; NPS, 1999; Skinner and Pavlik, 1995; Zeiner et al., 1988; Moyle, 1989.

marina, such as breakwater construction, pile driving, dredging, etc. that they would have no discernable impact to these resources. Based on Klein's selection criteria, the project would be considered to have minimal impacts upon tidal waterway resources.

The four special status fish species that were identified to potentially occur at or near the site include Pacific herring, steelhead (Central California Coast Evolutionary Significant Unit [ESU] and Central Valley ESU), coho salmon (Central California Coast ESU), and Chinook salmon (Central Valley winter-run ESU, Central Valley spring-run ESU, and Central Valley fall- and late-fall-run ESU). Pacific herring may use the site for spawning and may be present seasonally, as shown in Table 3. Salmon and steelhead do not spawn in the Bay or marina, but may be present seasonally during migration (see Table 5). The California brown pelican and double-crested cormorant are the only known rare or endangered species of birds that occur within close proximity (one mile) of the project site; both may use the site for feeding, resting, or transit, but do not nest at the site. Habitat for two special status animal species, harbor seal and the California sea lion, may occur at the project site. Harbor seals and sea lions may occasionally use the site, as populations of both are present nearby to the east (at Pier 39 and Seal Rock). Habitat for special status plant species at the project site and in areas adjacent to the project site is considered poor, because most of the grassland habitat has been extensively modified. Based on the lack of suitable habitat, no special status plant species are expected to occur on or near the project site.

IMPACTS TO FISHERIES

Short-term impacts on biological resources would occur from dredging and the repair/replacement of breakwaters, docks, and dock pilings during marina renovation. The National Oceanic and Atmospheric Administration (NOAA) Fisheries (formerly the National Marine Fisheries Service), Southwest Regional Office, was contacted during the initial agency scoping for the project. NOAA Fisheries provided a comment letter that identified several potential adverse impacts that are sometimes associated with activities that are proposed under the project (Rutten, 2003). The issues included harmful sound pressure levels associated with pile driving; increased turbidity due to construction of breakwaters, other in-water construction, and dredging; water quality degradation from the use of pressure-treated wood in pilings and docks; and increased predation on native fisheries due to the creation of cover for predatory fish species. The potential impacts identified by NOAA Fisheries are addressed below, as applicable, for the proposed project.

Potential Impacts of Dredging on Fisheries

As part of the project, about 87,000 cubic yards of material would be dredged from the West Harbor and 94,000 cubic yards of material would be dredged from the East Harbor. A permit from the U.S. Army Corps of Engineers (USACE) is already in place for the dredging proposed in the West Harbor. Prior to project implementation, the project sponsor would apply for project approval from the USACE for dredging in the East Harbor, and for the required approvals from the BCDC and San Francisco Bay Regional Water Quality Control Board (RWQCB). As part of project permitting, these agencies would consult with the California State Lands Commission, CDFG, NOAA Fisheries, USFWS, and the U.S. Environmental Protection Agency. Based on the results of this consultation, state and federal authorizations for the project would include the appropriate conditions to ensure that the project would not have a significant adverse effect on the environment. The interagency Dredged Material Management

Office (DMMO), which reviews all applications for dredging in the Bay, would also review the application for project dredging.

Dredging has long been identified as a potential source of impacts to fishery resources (primarily through habitat disruption and increased turbidity) and is addressed by the permitting agencies as well as in the Long-Term Management Strategy for the Placement of Dredged Material in the San Francisco Bay Region (LTMS) (USACE, 2001). The LTMS identifies specific work windows for dredging projects to protect salmonids and their habitats. Project dredging activities would be conducted within the work windows identified in the LTMS, and in compliance with the permit conditions imposed by the USACE, RWQCB, and BCDC. As such, potential impacts from dredging activities would be considered less than significant. For waters in central San Francisco Bay, the dredging and disposal work window for Pacific herring is between March 1 and November 30. The work window for salmonid species in central San Francisco Bay is June 1 through November 30. Potential project work windows are summarized in Table 6. Actual project work windows would be established during project permitting and would be adhered to for all project work. Thus, the proposed dredging would not result in a significant impact to fisheries.

**TABLE 6
CONSTRUCTION WORK WINDOWS FOR PILE DRIVING AND
OTHER IN-WATER ACTIVITIES**

Fish Species	Work Activity	Construction Work Windows for Project Activities, by Month											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Pacific herring	Pile Driving						W	W	W	W	W	(W)	
	Other In-Water Activities			W	W	W	W	W	W	W	W	W	
Chinook salmon	Pile Driving						W	W	W	W	W	(W)	
	Other In-Water Activities						W	W	W	W	W	W	
Coho salmon	Pile Driving						W	W	W	W	W	(W)	
	Other In-Water Activities						W	W	W	W	W	W	
Steelhead	Pile Driving						W	W	W	W	W	(W)	
	Other In-Water Activities						W	W	W	W	W	W	

W = Work window during which the identified construction activities would minimize impacts to fisheries, in accordance with specific guidance provided by the LTMS (USACE, 2001) for dredging and dredge-disposal-related activities. The pile driving work window guidelines were provided by NOAA Fisheries (Rutten, 2003) and other published fisheries literature that represents the best available scientific data relevant to construction windows that minimally impact fish species.

(W) = Possible work window. NOAA Fisheries established a June 1 to November 30 work window for pile driving activities on another project in the East Harbor (Filice, 2003). The actual project construction work window would be determined by the USACE in consultation with NOAA Fisheries during the permitting phase of the project.

Potential Impacts of Increased Turbidity on Fisheries

A significant impact to commercial Pacific herring could occur if piling replacement or other in-water construction or dredging activities were to take place during the spawning and juvenile rearing period of December 1 through March 1. Such activities could increase turbidity, reduce water quality, and either directly or indirectly affect the health of juvenile or adult herring or their eggs, due to the removal of pilings where herring have spawned, smothering of eggs with sediment, reduced oxygen as a result of chemical changes in the water column associated with dredging, and/or disruption of normal feeding behavior. Restricting in-water construction activities to the period between March 1 and November 30 would avoid such impacts to Pacific herring. Actual project work windows would be established during project permitting and would be adhered to for all project work. As a result, turbidity impacts to Pacific herring would be less than significant.

The project site is currently operated as a marina. Given that there would be no substantial change in in-water activities during project operations, no long-term change in turbidity levels at the site are expected as a result of project implementation.

Potential Impacts of Pile Driving on Fisheries

The project would involve placement of 750 concrete pilings within the marina. If salmonid species are present in the project area, increased sound pressure levels during pile-driving activities could result in significant impacts to such species. Rutten (2003) identified several salmonid species, including coho salmon, Chinook salmon, and steelhead, as potentially present in the project area between the period of November 1 to June 1. Outside of this period, salmonids are not expected to be present in the project vicinity. Based on input from NOAA Fisheries (Rutten, 2003), avoiding pile-driving activities between November 1 and June 1 would avoid potential impacts to salmonids (refer to Table 4 for potential work windows for pile driving). Because the proposed project would not involve pile driving from November 1 to June 1 (or as otherwise stipulated by NOAA Fisheries and USFWS), the impacts of such activities on fisheries would be less than significant.

Indirect Impacts on Salmonids due to Increased Predation

NOAA Fisheries identified that the addition of new docks, pilings, breakwaters, and other in-water structures could provide increased opportunities for predatory fish to prey upon juvenile listed salmonids (Rutten, 2003). The area of new floating docks would increase slightly, as would the amount of fill with new breakwaters. The area of the water's surface currently covered by floating docks is about 120,000 square feet. With the project, about 154,200 square feet would be covered, for a net increase of 34,200 square feet. New fill for breakwaters would be about 16,350 cubic yards placed below MHT (16,000 cubic yards in the West Harbor and 350 cubic yards in the East Harbor). This amount of fill would be offset by the 12,000 cubic yards of fill below MHT that would be removed from the marina with the removal of the West Harbor breakwater at the foot of Scott Street, for a net increase of about 4,350 cubic yards of fill below MHT. This amount of additional fill and dock area is not expected to increase the number of predatory fish. Consultation and coordination with NOAA Fisheries on project design to minimize shading and ambush sites and compliance with USACE permit conditions would ensure that potential impacts to salmonids due to increased predation would be less than significant.

Potential Impacts of Treated Wood Use on Fisheries

Under the proposed project, 705 creosote-treated pilings would be removed and replaced with 750 concrete pilings, and all floating (wood) walkways would be replaced. NOAA Fisheries (Rutten, 2003) advised that "...pressure-treated wood used in the construction of pilings, docks, and boardwalks can leach copper and other chemicals known to be harmful to salmonids." To the extent possible, the project would include alternative materials, such as steel, concrete, composite, plastic, reinforced structural plastic, polymer-coated wood, and untreated wood. Any treated wood products used would be approved by NOAA Fisheries and other regulatory agencies. The removal of the creosote-treated pilings would result in a net reduction in the amount of treated wood in the marina and would result in a small, long-term improvement to water quality.

IMPACTS ON MARINE MAMMALS

It is possible that California sea lions and harbor seals swimming in the vicinity of the project during pile driving could be subject to elevated sound pressure levels that could in turn interfere with the animals' hearing. Construction and other human activity around the site could also potentially result in behavioral changes in nearby pinnipeds (fin-footed mammals). If present, California sea lions and harbor seals might temporarily cease normal activities, such as feeding, or might pop their heads up above water in response to the noise. The animals might also be curious and choose to investigate the project site.

The state and federal resource agencies have not developed specific guidance or significance criteria to establish thresholds for determining potentially disturbing or adverse noise impacts on marine mammals. However, other recent projects involving pile driving that have been permitted and constructed along San Francisco Bay and elsewhere in the region provide some guidance on this issue. In particular, two similarly scaled projects (one in Sausalito and one at the mouth of the Noyo River), both with pile driving components, were determined by the USACE and NOAA Fisheries to have negligible effects on California sea lions and harbor seals, despite their presence in each area. Based on these determinations for similar projects, only short-term, negligible impacts on these marine mammals are anticipated as a result of proposed project construction. As a project improvement measure to further reduce potential impacts to harbor seals and California sea lions, the technique of "dry firing" could be integrated into pile-driving activities at the start of each day, if marine mammals are identified within 150 feet of the work area (see Improvement Measure 1, page 74).

The project site is currently operated as a marina. Given that there would be no substantial change in operation of the marina with the project renovations, no changes in potential long-term impacts to marine mammals are expected as a result of the project.

IMPACTS ON AQUATIC HABITAT

Although the entire San Francisco waterfront is considered Essential Fish Habitat (EFH is broadly defined as waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity), the placement of the new breakwaters, docks, and pilings would minimally decrease available open water in the marina, and continued marina operations would have no change on habitat over existing conditions. Because the project would largely replace the existing and degraded marina facilities and result in a relatively limited amount of net new fill (about 4,350 cubic yards below MHT) in relation to total

available habitat, the project would not substantially alter the availability of shoreline or open water habitat in the marina. The aquatic habitat would be essentially identical prior to and following project implementation. Impacts to such habitats during construction would be considered temporary and intermittent during the 36-month construction period and would be limited in extent to areas where fill would be placed or piles driven. Such short-term, construction-related disturbances to aquatic species and their habitat would be considered a less-than-significant impact.

IMPACTS OF LIGHTING ON WILDLIFE

The proposed project would incorporate relatively low-height, low-intensity lighting on docks, with standard exterior lighting in upland portions of the project site and in on-site buildings. Project lighting would be consistent with existing lighting at the marina and along the Bay shoreline, which has not been demonstrated to pose a significant impact to flying birds or other wildlife, including black crowned night heron and killdeer, which occur locally. As previously mentioned, project lighting is expected to reduce the amount of light and glare associated with marina operations. As a result, outdoor lighting associated with the proposed project is not expected to result in a significant impact to wildlife or pose an increased strike hazard to migratory or other flying birds. Given that the project would decrease light and glare from the marina, there would be no deterrent to birds using the marina or adjacent areas due to increased light levels. Additionally, black crowned night heron, killdeer, and other bird species are expected to use the marina and surrounding area to the same degree as currently.

Cumulative Impacts

Of the seven major projects now in planning in the San Francisco Marina area, as described in Section D, three are primarily inland projects that would not substantially impact biological resources or aquatic resources in San Francisco Bay; three would improve habitat benefits and values for biological resources; and the remaining project, the Ferry Access Study, is too speculative to determine a probable level of impact upon biological resources (if initiated as a project). The biological impacts of these project are discussed further below.

The three primarily inland projects are the Fort Mason Center Long Term Lease, the Doyle Drive Replacement Project, and the Muni E-Line Extension to Fort Mason. Due to the general absence of sensitive biological resources near these projects, they are expected to have only minimal impacts, if any, to biological resources. Because impacts to biological resources would be largely negligible as a result of these projects, when considered with the current project, cumulative impacts are not expected.

The three local projects with habitat restoration, enhancement, and resource management emphases are the Presidio Trust Management and Implementation Plan (though some upland development is included), Crissy Field Marsh Expansion, and the Tennessee Hollow Restoration Project. Considered cumulatively with the San Francisco Marina project, these projects would result in a net benefit to biological resources, particularly with regard to aquatic resources in San Francisco Bay.

The Ferry Access Study examines alternative water access to park sites in San Francisco Bay with potential ferry terminal sites that include existing piers at Fort Mason Center. If the Ferry Access Study is adapted into a project, the resulting impacts to biological resources would be speculative. Such impacts would presumably be minimal if the selected terminal site were located at a deep water site along an

existing pier. Future work on this project as a result of dredging or new pier construction would be expected to impact biological resources and aquatic resources in direct relation to the magnitude of construction. Such impacts, however, are highly speculative and it is likely that should the project be undertaken, an existing, compatible site would be selected both to reduce impacts to biological resources and minimize project costs.

As identified under Water Quality, below, the project may result in an overall improvement to water quality in the West Harbor as a result of increased flushing and the implementation of specific management measures. This cumulative analysis identifies that the three local projects described above are expected to result in a net benefit to habitat quality and the quantity of available natural habitat in the local vicinity. As a result, adverse cumulative impacts to biological resources are not expected.

9) <u>Geology/Topography</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction).			<u>TO BE DETERMINED</u>
(b) Change substantially the topography or any unique geologic or physical features of the site?	_____	<u> X </u>	<u> X </u>

This Initial Study section discusses potential impacts related to seismic and other geologic hazards including surface rupture from faulting, landslides, dam inundation, and tsunamis. As discussed below, these impacts are found to be less-than-significant. Potential impacts related to other seismic and geologic hazards including ground shaking and secondary effects will be discussed in the EIR due to the project's location in a liquefaction zone. Coastal erosion will also be discussed in the EIR as construction of new breakwaters has the potential to result in erosion impacts on adjacent land uses (i.e., Crissy Field and Fort Mason).

SITE GEOLOGY AND TOPOGRAPHY

The project site is almost entirely underlain by hydraulic fill deposits, deposited from 1912 to 1917, and artificial fill dating from 1895 to 1906 (Treadwell and Rollo, 1997). Hydraulic fill deposits are composed mostly of sand and silty sand dredged from the Bay and pumped into their current locations, without any attempts at densification. The southwestern corner of the site is underlain by beach sand deposits, which consist mostly of soft, loosely compacted, homogeneous sand (Blake et al., 2000). The spit on which the Saint Francis Yacht Club is constructed was filled during the early 1900s through the 1930s. The project site is relatively flat (slopes less than 5 percent) at an elevation of about 9 feet above mean sea level (U.S. Geological Survey [USGS], 1995).

Groundshaking and Secondary Effects

The San Francisco General Plan Community Safety Element contains maps that show areas of the city subject to geologic hazards. The project site is located in an area subject to moderate ground shaking due to an earthquake along the peninsula segment of the San Andreas and northern Hayward faults (Maps 2

and 3 of the Community Safety Element). During certain earthquakes, partially consolidated sediments (such as the hydraulic fill and loose sand deposits on the project site) can amplify ground shaking, resulting in structural damage considerably higher than would be experienced by a building placed on such materials as bedrock or consolidated sediments.

The project site could experience a range of ground shaking effects during an earthquake. Ground shaking could cause secondary ground failure, such as liquefaction and settlement. The project site is located in an area of liquefaction potential (Map 4 of the Community Safety Element; Department of Conservation, 2001), indicating that underlying geologic materials have a relatively high susceptibility to ground failure due to liquefaction (i.e., failure of saturated earth materials when subjected to shaking). Because the project has the potential to expose people or structures to ground shaking and liquefaction, this would be a potentially significant impact and will be further analyzed in the EIR.

Surface Rupture

The project site is not located in an Alquist-Priolo Earthquake Fault Zone²⁰ as defined by the California Department of Conservation Division of Mines and Geology (CDMG), and no active or potentially active faults exist on or in the immediate vicinity of the site.²¹ The nearest active faults are the San Andreas fault, located 7 miles southwest of the site; the Hayward fault, located 12 miles northeast; the San Gregorio fault, located 15 miles southwest; and the Calaveras fault, located 20 miles northeast (Jennings et al., 1991). Because the site is not located on an active or potentially active fault, the potential for surface fault rupture is low, and the impact is considered less than significant.

Tsunamis

The project site is located in an area identified for potential inundation in the event of a tsunami along the San Francisco coast, based on a twenty-foot water level rise at the Golden Gate (Map 6 of the Community Safety Element). Although extremely rare, a tsunami could cause damage to the marina facilities and boats docked at the harbors. However, the proposed project would not change or worsen this existing condition, and there is a well established warning system in place that would provide early notification of an advancing tsunami which would allow for evacuation. This system is described below in more detail. Therefore, potential impacts to public safety due to inundation by a tsunami would be less than significant.

A tsunami is an advancing ocean wave originating from an earthquake epicenter. In San Francisco, the potential for damage due to direct wave action resulting from a tsunami would be expected to be limited to the coastline along the Pacific Ocean, including Ocean Beach between the Golden Gate Bridge and Fort Funston (City and County of San Francisco, 2005). Because the advancing ocean wave would be restricted at the Golden Gate, damage due to direct wave action along the San Francisco Bay shoreline is

²⁰ Alquist-Priolo zones designate areas most likely to experience fault rupture, although surface fault rupture is not necessarily restricted to those zoned areas.

²¹ An active fault is defined by the State of California as a fault that has had surface displacement within Holocene time (approximately the last 10,000 years). A potentially active fault is defined as a fault that has shown evidence of surface displacement during the Quaternary (last 1.6 million years), unless direct geologic evidence demonstrates inactivity for all of the Holocene or longer. This definition does not, of course, mean that faults lacking evidence of surface displacement are necessarily inactive. "Sufficiently active" is also used to describe a fault if there is some evidence that Holocene displacement occurred on one or more of its segments or branches (Hart, 1997).

not considered likely. However, the Bay shoreline between the Palace of Fine Arts and the Central Basin could be subjected to a seiche, or oscillation of the Bay water surface, as a result of a tsunami reaching the Golden Gate and damage could occur in inundated areas.

The National Weather Service operates the Alaska Tsunami Warning Center in Palmer, Alaska which serves as the regional Tsunami Warning Center for Alaska, British Columbia, Washington, Oregon, and California. This center monitors seismological and tidal stations throughout the Pacific Basin to evaluate whether an earthquake is capable of producing a tsunami and disseminates tsunami warning information. In the event that an earthquake occurred that would be capable of producing a tsunami that could affect San Francisco, the County of San Francisco would receive the warning through the State Warning System. The San Francisco outdoor warning system would then be initiated which would sound an alarm alerting the public to tune into local TV, cable TV, or radio stations which would carry instructions for appropriate actions to be taken as part of the Emergency Alert System. Police would also canvas the neighborhoods sounding sirens and bullhorns, as well as knocking on doors as needed, to provide emergency instructions. Evacuation centers would be set up if required. The advance warning system would allow for evacuation of people prior to a tsunami and would provide a high level of protection to public safety.

Although people would be evacuated in the event of a tsunami, there could be property damage due to inundation and swamping of small vessels. However, tsunamis are extremely rare and there would not be a substantial change from existing conditions with regard to marina facilities and number of boats docked at the harbors. Therefore, potential impacts related to damage to structures and boats would also be less than significant.

Coastal Erosion

Coastal erosion can be considered a hazard if it occurs unimpeded over an extended period and causes property damage. Long-term erosion due to wave action is currently degrading installed rock slopes and basin slopes in the East and West Harbors, the breakwater structure of the West Harbor, the lower portion of the perimeter seawall near the Harbor Office, and installed rubble revetments in the outer basin of the West Harbor. Slopes in the East Harbor along the land-side perimeter are failing due to wave action.

In order to protect the West Harbor from waves coming from the north, northeast, and northwest, the project sponsor proposes installation of two new breakwaters to absorb wave energy. One of these breakwaters would connect to the existing north jetty and would be composed of either sheetpile or rock. The other breakwater would extend out from the seawall on the north side of Marina Green and would also be composed of either sheetpile or rock. In the West Harbor, the existing mole at the foot of Scott Street would be removed and the mole separating the inner and outer harbors would be shortened. In the East Harbor, long-period wave energy would be dissipated by installing a new floating breakwater (wave attenuation structure) near the entrance to the East Harbor. Modeling performed for the project (Moffatt & Nichol, 2004) indicates that these breakwaters would effectively reduce wave heights and current velocities in the harbors. In addition, deteriorated portions of the existing rip-rap slopes along the interior shorelines of the marina would be stabilized by “locking” the slope toe (base) into the Bay floor and installing filter fabric. The reduced wave action within the harbors and improvements to the rip-rap slopes would reduce the potential for erosion within the harbors. Therefore potential impacts related to erosion within the harbors would be less than significant.

Without proper design and placement, construction of new breakwaters has the potential to result in erosion impacts on adjacent land uses (i.e., Crissy Field, Fort Mason). Modeling performed by Moffatt & Nichol Engineers indicates that the proposed breakwaters would result in no or very little change in current velocity or wave action outside of the marina. Nevertheless, the potential for the project to cause off-site coastal erosion will be further analyzed in the EIR.

Landslides

The site is not in a potential landslide hazard area (Map 4 of the Community Safety Element). The topography of the project site is flat, and thus no significant landslide impacts are anticipated.

Dam Inundation

The site is not near any dam or public reservoir and is not subject to inundation due to reservoir failure (Map 7 of the Community Safety Element). Therefore, the project would not affect nor be affected by dam failure, whether caused by a seismic event, flood, unstable slope conditions, or other reasons.

Unique Geological Features

No unique geologic features or physical features of the site would be altered as a result of the project. Therefore, the proposed project would have a less-than-significant impact to local topography.

CUMULATIVE IMPACTS

The proposed project would have no significant impacts related to surface rupture from faulting, landslides, dam inundation, and tsunamis. Therefore, no cumulative impacts related to these have been identified. The potential for cumulative impacts related to ground shaking and coastal erosion will be addressed in the EIR prepared for the project.

10) <u>Water Quality</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Substantially degrade water quality, or contaminate a public water supply?			<u>TO BE DETERMINED</u>
(b) Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?	_____	<u> X </u>	<u> X </u>
(c) Cause substantial flooding, erosion or siltation?			<u>TO BE DETERMINED</u>

This Initial Study section discusses potential water quality impacts related to design and operation of the marina, maintenance dredging of the West Harbor, and construction activities in both harbors. As described below, these impacts are found to be not significant and will not be discussed in the EIR for the

project. The EIR will discuss potential impacts related to dredging and disposal of the East Harbor sediments which could have potential water quality impacts.

POTENTIAL WATER QUALITY IMPACTS RELATED TO DESIGN OF MARINA

The siting and design of the proposed project could have the potential to affect water quality in San Francisco Bay. However, under the Coastal Zone Management Act Reauthorization Amendments, the State Water Resources Control Board (SWRCB) and the California Coastal Commission (CCC) have developed a Nonpoint Source Pollutant Control Program that includes water quality control measures for assessment, siting, and design of marinas to reduce water quality impacts from these activities (SWRCB and CCC, 2000). Through a memorandum of understanding (MOU) with the SWRCB and San Francisco Bay Regional Water Quality Control Board (RWQCB), the San Francisco Bay Conservation and Development Commission (BCDC) is an implementing agency for control of nonpoint source pollution from marinas and recreational boating; the BCDC Final Staff Report, Water Quality Protection and Nonpoint Source Pollution Control in San Francisco Bay (BCDC, 2003) addresses polluted runoff from these sources, describes BCDC's current polluted runoff control permit conditions, and describes applicable management measures.

The project would be subject to BCDC's nonpoint source pollution requirements, and BCDC could specify nonpoint source pollution control measures in its Major Permit for the project. As part of its regional responsibility for protecting water quality, the RWQCB may also review BCDC's Major Permit and conditions for the project. As discussed below, implementation of these measures would reduce the potential for water quality degradation in the harbors due to design of the marina facilities. Because the project would be required to comply with these measures as part of its BCDC permit conditions, potential water quality impacts related to design of the marina would be less than significant. Water quality management measures implemented by the BCDC that could be applicable to the design of the marina include Water Quality Assessment, Flushing Rates, Shoreline Stabilization, Stormwater Runoff, Fueling Station Design, Sewage Facilities, and Waste Management Facilities.

A numerical model was used to evaluate how the proposed reconfiguration of the breakwaters would affect flushing rates (the time it takes for water to circulate in and out of the marina) and sedimentation patterns (how water-borne sediments are deposited inside and outside of the marina). This modeling would be subject to review by the BCDC as part of the application process for the Major Permit. The modeling concluded that the structures would not result in an increase in the amount of time required to flush the harbors nor increase in sedimentation rates (Moffatt & Nichol Engineers, 2004).

Water Quality Assessment

The proposed project includes construction of two new breakwaters in the West Harbor, one new floating breakwater (a wave attenuation structure) in the East Harbor, removal of one breakwater structure (mole) at the foot of Scott Street, and shortening of the mole separating the Inner and Outer West Harbors. The floating docks and slips within each harbor would also be replaced and reconfigured. The Laguna Street combined sewer overflow (CSO) outfall structure is located within the East Harbor and the Pierce Street CSO outfall structure is located within the West Harbor. The combined sewer system is designed to achieve a long term annual average of four CSO discharges at both of these locations, although the actual

number of discharges has historically been less. Under the existing National Pollution Discharge Elimination System (NPDES) permit, the City and County of San Francisco is permitted to discharge partially treated combined sewage (stormwater and wastewater) into the harbor in compliance with permit conditions. If the project results in reduced water circulation within the harbors, this could affect the existing water quality with regard to dilution and flushing of CSO discharges during the overflow events that occur on average three times per year and only during or immediately after rainstorms. A numerical model was used to evaluate how the proposed reconfiguration of the breakwaters would affect flushing rates, which is the time for water to circulate in and out of the marina, as well as sedimentation patterns, which is how water-borne sediments are deposited inside and outside of the marina (Moffatt & Nichol, 2004) As described below, no significant reduction in water circulation is anticipated as a result of the project.

Flushing Rates

The design of the marina renovations could affect water quality by changing the circulation pattern and flushing rates in the marina. Modeling demonstrated that flushing rates (measured as the residence time, or time it takes to flush a water quality constituent out of the marina) within the West Harbor would be improved slightly over existing conditions; in other words, the time necessary to flush portions of the inner harbor would decrease slightly with implementation of the project. Under existing conditions, the maximum residence time is 4.8 days in the Inner West Harbor and the minimum residence time is 0.3 to 0.6 days at the entrance of the harbor. Under the proposed configuration, the maximum residence time would still be 4.8 days, but the area that would be subject to this maximum flushing rate would be restricted to the westernmost portion of the Inner West Harbor. Shortening of the mole separating the Inner and Outer West Harbor would reduce the residence time in the eastern portion of the Inner West Harbor to approximately 4.5 days (about 7 hours less) which would be a slight improvement over existing conditions. Flushing rates at the entrance to the West Harbor would be essentially unchanged near the entrance to the West Harbor with implementation of the project.

Residence time in the East Harbor is 0.01 to 1.2 days under existing conditions, with the residence time increasing with distance from the entrance, as is typical for marine basins. Flushing rates within this harbor would be unchanged with implementation of the project, since currents and tides would continue to move freely underneath the proposed floating breakwater structure. Therefore, the project would have a less-than-significant impact on water quality related to flushing rates in the harbors.

As discussed above, the numerical modeling that has been used to predict the effects of the reconfigured breakwaters on flushing and sedimentation (Moffatt & Nichol Engineers, 2004) would be subject to review by the BCDC as part of the application process for the Major Permit, ensuring that the project structures would be constructed such that there would not be a substantial increase in the time required to flush the harbors or an increase in sedimentation rates over existing conditions. Therefore, the project would have a less-than-significant impact related to flushing rates.

Sedimentation Rates

Construction of new breakwaters and removal or shortening of existing breakwater structures (moles) could affect existing sedimentation patterns in the West and East Harbors, which in turn could affect water quality. Modeling results show that current velocities in the West Harbor would increase up to 0.1

meter per second in the entrance channel between the new breakwaters. The combination of this small increase in current velocity, small increase in wave energy in front of the new breakwaters, and decrease in wave energy in the sheltered (lee) side of the breakwaters could decrease the sedimentation rate in front of the new breakwater structures and increase the sediment deposition rate behind the structures although there would be no change in the average annual deposition rate in the vicinity of the harbor entrance. Sand mining currently conducted in the Outer Jetty area deepens the area to the north of the existing breakwater and provides a temporary sediment trap which decreases sedimentation around the existing breakwater and would continue to decrease sedimentation rates within the West Harbor after the reconfigured breakwaters are constructed. The City currently conducts periodic monitoring of the Outer Jetty area in accordance with its maintenance dredging permit (USACE, 2000) to estimate the rate of sand deposition and to identify the most effective long-term management strategy for control of sand deposition in the Outer Jetty area and subsequently in the West Harbor.

Construction of the breakwater in the East Harbor would result in a change in current velocity of less than 0.02 meters per second. Therefore the breakwater would not be expected to increase sedimentation rates in the harbor over the estimated 0.3 feet per year that occurs under existing conditions (Moffatt & Nichol Engineers, 2004).

As discussed above, the numerical modeling that has been used to predict the effects of the reconfigured breakwaters on flushing and sedimentation (Moffatt & Nichol Engineers, 2004) would be subject to review by the BCDC as part of the application process for the Major Permit, ensuring that the project structures would be constructed such that there would not be a substantial increase in the time required to flush the harbors or an increase in sedimentation rates over existing conditions. Therefore, the project would have a less-than-significant impact on sedimentation rates in the harbors.

The potential for impacts related to off-site erosion at locations up and down coast from the marina will be addressed in the Geology section of the EIR for this project along with the potential for sedimentation or erosion at the location of the Wave Organ.

Shoreline Stabilization

The existing degraded rip-rap slopes around the interior shorelines of the marina are currently subject to erosion. The proposed reconstruction of the degraded rip-rap slopes would meet the requirements of BCDC's shoreline stabilization management measure and reduce the potential for erosion of the slopes, resulting in a long term improvement in water quality. Therefore, no water quality impacts related to shoreline stabilization are expected.

Stormwater Runoff

Runoff from impervious surfaces could contain suspended solids and other pollutants. Without proper pollution controls this runoff could degrade water quality. However, stormwater runoff from the parking area and other on-land portions of the project site currently drains to the combined sewer system and is treated and discharged to the Bay in compliance with the City's National Pollutant Discharge Elimination System permit. In accordance with the permit, the discharges to the Bay are in conformance with requirements of the Clean Water Act, Combined Sewer Overflow Control Policy, and the associated state requirements in the Water Quality Control Plan for the San Francisco Bay Basin (RWQCB, 1995).

Therefore, the stormwater management controls currently implemented by the City already fulfill the requirement of the stormwater runoff management measure. Stormwater runoff would continue to be directed to the City's combined sewer system under the proposed project. Therefore, no water quality impacts related to stormwater runoff are expected to occur with the project, and no additional stormwater management measures are needed.

Fueling Station Design

The existing fueling station in the East Harbor (described in the Hazards section) operates in accordance with applicable state and local regulations pertaining to spill control. Although the proposed project could result in a greater number of larger power and sail boats using the marina, the project would not result in a change in fuel storage requirements as there is sufficient storage capacity, even though there may be a potential negligible increase fuel deliveries. Therefore, the project sponsor does not propose modifications to the fueling station. However, the BCDC could require modifications to the design of this facility as special conditions of the Major Permit that would be issued for the project. Although specific permit requirements cannot be predicted, the project sponsor would comply with all permit conditions regardless. Since the fueling station is currently operated in compliance with existing regulations (described in the Hazards section) and will continue to comply with all permit conditions, no water quality impacts related to fueling station design would be expected to occur.

Sewage Facilities

Improper discharge of sewage from recreational boats within the harbors could degrade water quality. Discharge of sewage is currently prohibited within the marina waters, and this prohibition would remain in place under the proposed project. The project includes refurbishment of the two existing sewage pumpout units (one located in the West Harbor and one located in the East Harbor), an additional sewage pumpout unit in the West Harbor, renovation of existing public restrooms, and addition of new restroom facilities. These facilities would provide further protection of water quality by providing easy access to sewage facilities and would meet the requirements of BCDC's sewage facilities management measure. The project sponsor would post signs at locations easily accessible to all boaters and visiting public, informing the public of the location of the sewage pumpout facilities, showers, and restroom facilities to promote their use, and discourage discharge of sewage within the harbors, as specified in Improvement Measure 2, page 74.

Waste Management Facilities

Normal boat maintenance activities at the marina could cause water quality degradation, unless appropriate and accessible waste handling facilities are provided. The existing used oil and oil filter recycling kiosk located at the East Harbor parking lot would remain in place under the proposed project. The kiosk accepts used oil, used filters, bilge oil pads, and other hazardous materials such as batteries and solvents. The Harbor Office would also continue to provide free bilge oil pads to boaters, along with educational materials.

The project would not result in an increase in oily wastes produced at the marina. However, three oily water pumpout facilities would be provided – one new facility and two retrofitted sewage pumpouts (Figure 3). These facilities (two in the West Harbor and one in the East Harbor) would be located to

allow ease of access by recreational boaters and would provide further protection of water quality beyond existing conditions by adding facilities for proper disposal of oily wastes from boats that use the marina. Provision of these facilities would meet the requirements of BCDC's waste management measure. As specified in Improvement Measure 2, signs would be posted at locations easily accessible to all boaters and the visiting public, informing them of the location of the proposed pumpout facilities and existing recycling kiosk to promote their use and discourage the discharge of oily water and wastes within the marina.

Provisions for compliance with the management measures described above would be reviewed by the BCDC and RWQCB as part of the review and approval process for the Major Permit required for the project. Compliance with these management measures would be incorporated as a special permit requirement of the Major Permit issued and enforced by the BCDC. Therefore, water quality impacts related to the design of the renovated marina would be less than significant.

POTENTIAL WATER QUALITY IMPACTS RELATED TO MARINA OPERATION

As part of the Major Permit that would be issued for the project, BCDC would require compliance with Nonpoint Source Pollutant Control Program management measures specific to marina operations. As discussed below, implementation of these measures would protect water quality within the harbors during marina operation, and because of compliance with these measures, water quality impacts related to operation of the marina would be less than significant. Water quality management measures that BCDC could require for protection of water quality during operation of the marina include Solid Waste Control, Fish Waste, Liquid Material Control, Petroleum Control, Boat Cleaning and Maintenance, and Maintenance of Sewage Facilities.

Maintenance of the used oil and oil filter recycling kiosk and provision and maintenance of the oily water and sewage pumpout facilities would comply with the management measures for Solid Waste Control, Liquid Material Control, Petroleum Control, and Maintenance of Sewage Facilities. Fish processing would continue to be prohibited within the marina, and enforcement of this restriction would ensure compliance with the fish waste management measure. The project sponsor could conduct public education activities, in accordance with Improvement Measure 2 (see page 74) to educate marina tenants about the potential water quality impacts related to the use of cleaners, solvents, and paints for boat cleaning and maintenance; encourage tenants to restrict the use of these materials; educate tenants about more environmentally sound alternatives to the use of these materials; and encourage tenants to minimize underwater hull cleaning and maintenance. Implementation of this measure would provide additional water quality protection from potential impacts associated with boat cleaning and maintenance and would ensure compliance with the Boat Cleaning and Maintenance management measure. Implementation of these management measures would provide protection of water quality within the marina, regardless of the number of power boats and sail boats using the marina.

Provisions for compliance with the management measures described above would be reviewed by the BCDC and RWQCB as part of the review and approval process for the Major Permit required for the project. Compliance with these management measures would be incorporated as a special permit requirement of the Major Permit issued and enforced by the BCDC. Therefore, water quality impacts related to operation of the renovated marina would be less than significant.

POTENTIAL WATER QUALITY IMPACTS RELATED TO MAINTENANCE DREDGING OF WEST HARBOR

This section addresses water quality impacts related to maintenance dredging of the West Harbor, which can be completed under the existing maintenance dredging permit from the USACE.²² Dredging of the East Harbor sediments, some of which contain elevated levels of polynuclear aromatic hydrocarbons (PAHs), would be subject to a new dredging permit and potential water quality effects associated with this activity will be addressed in the Water Quality section of the EIR.

Similar to existing conditions, operation of the renovated marina would require periodic maintenance dredging to sustain the desired depth of sediments in the West Harbor. This maintenance dredging is covered under an existing dredging permit from the USACE (USACE, 2000). Compliance with this permit would assure that adequate water quality protection measures are implemented; therefore water quality impacts related to maintenance dredging in the West Harbor would be less than significant.

Proposed renovations include dredging of approximately 87,000 cubic yards of sediment from the West Harbor in accordance with the provisions of the existing permit. Dredging would result in short-term disturbance of localized Bay sediments. This could, in turn, result in adverse water quality effects since disturbance of the sediments could temporarily increase turbidity and re-suspend these sediments in Bay waters.

Suspended sediments in the water column can lower levels of dissolved oxygen, increase salinity, and possibly release chemicals present in the sediments into the water. However, increased turbidity levels would be relatively short-lived and generally confined to within a few hundred yards of the activity. After initial high turbidity levels, sediments would disperse and background levels would be restored within hours of disturbance. Therefore, only temporary water quality impacts related to suspended solids from maintenance dredging in the West Harbor would be expected.

Sampling for the most recent dredging episode (Advanced Biological Testing, 1999) indicates that sediments from the West Harbor have been suitable for in-bay disposal at the Alcatraz Disposal site. While there could be potential water quality effects related to dredging and disposal of dredged sediments from the West Harbor, this disposal would be conducted under the existing maintenance dredging permit from the USACE. This permit requires sampling, testing, water quality certification from the RWQCB²³ and approval by BCDC prior to each dredging episode. Compliance with this permit would assure that adequate water quality protection measures are implemented; therefore water quality impacts related to maintenance dredging in the West Harbor would be less than significant.

²² The San Francisco Planning Department determined that the West Harbor dredging could not have a significant effect on the environment and issued a Negative Declaration for that project on May 18, 1999. This document is available for review by appointment as part of Case File No. 1998.834E at 1660 Mission Street, Suite 500, San Francisco, CA 94618.

²³ Section 401 of the Clean Water Act provides the State Water Resources Control Board and the Regional Water Quality Control Boards with the regulatory authority to waive, certify, or deny any proposed federally permitted activity, which could result in a discharge to surface waters of the State. To waive or certify an activity, these agencies must find that the proposed discharge will comply with State Water quality standards. If these agencies deny the proposed activity, the federal permit cannot be issued.

POTENTIAL WATER QUALITY IMPACTS RELATED TO CONSTRUCTION ACTIVITIES

The proposed project would include construction of 800 feet of new breakwaters at the West and East Harbors, which would require placement of new fill over an area of 10,000 to 15,000 square feet at the West Harbor and placement of new fill over an area of 200 square feet at the East Harbor. In addition, 16,000 square feet of breakwater would be removed from the West Harbor Inner Basin, requiring removal of approximately 12,000 cubic yards of existing fill. Also, 705 existing creosote-treated piles would be replaced with 750 12- to 18-inch diameter concrete pilings; the new pilings would all be placed within the footprint of the marina docks.

Construction of these in-water features would be subject to the requirements of a Section 10 permit from the USACE and water quality certification, or waiver, by the RWQCB. In addition to providing water quality certification for activities that would be conducted in the Bay, the water quality certification would include specific conditions requiring use of best management practices to: minimize the discharge of construction materials into the Bay; control floating debris; control discharge of displaced water produced during construction of the concrete pilings to minimize discharge of pollutants to the Bay; place fueling activities such that they would not affect water quality; and provide spill containment to control potential accidental spills and equipment to cleanup potential spills during construction.

Although removal of creosote pilings may release some organic substances to the water column, water quality effects would be temporary, and removal of creosote-treated wood pilings and replacement with concrete pilings may result in a small, but long-term improvement in water quality. Compliance with the Section 10 permit and subsequent RWQCB water quality certification, or waiver, would ensure that water quality impacts related to construction activities would be less than significant.

The project site is not located near the watershed of a public drinking water supply, and neither construction nor operation activities could affect any public water supply. On-land developments for the marina renovation would require minimal land disturbance (about 100 cubic yards for the new maintenance building and 10 cubic yards for restroom expansion) and introduce a minimum of new impervious surface (about 1,000 square feet for the maintenance building and 600 square feet for the East Harbor restroom). Therefore, it is unlikely that groundwater would be encountered and no impacts to groundwater resources or recharge are anticipated. The project would not result in any changes in the flood elevation of any structures, and no flooding impacts are anticipated.

CUMULATIVE IMPACTS

The proposed project would result in an overall improvement to water quality because of increased flushing in the West Harbor and implementation of specific management measures that would be required at both harbors for the design and operation of the marina as a condition of the BCDC major permit required for the project. Maintenance dredging required to maintain the West Harbor at the desired operational depth and disposal of the dredged sediments would be conducted under an approved permit from the USACE which would be subject to water quality certification, or a waiver, from the RWQCB. Therefore, the components of the project discussed in this Initial Study would have no significant water quality effects.

The major planned or proposed projects that could have a potentially cumulative impact related to design and operation of the marina or maintenance dredging of the West Harbor include the planned renovations as part of the Fort Mason Center Long Term Lease and Ferry Access Study, discussed in Section D of this Initial Study. Similar to maintenance dredging for the West Harbor, in-Bay construction activities for Pier One renovations at Fort Mason could cause temporary water quality impacts although they would generally be restricted to the area of disturbed sediments and would be subject to the permitting requirements of the US Army Corps of Engineers and RWQCB . Because the water quality effects of these activities would be temporary and of limited extent, no cumulative impacts related to construction activities in the Bay would be expected. Construction of a ferry terminal at Fort Mason, as could be proposed in the Ferry Access Study, is too speculative to estimate potential water quality impacts associated with it. However, similar to the proposed project, any terminal project at Fort Mason would be subject to BCDC management measures and construction activities in the Bay would be subject to the permitting requirements of the US Army Corps of Engineers and RWQCB which would reduce the potential for water quality degradation. Therefore, no cumulative water quality impacts are expected. Cumulative impacts to water quality associated with dredging in the East Harbor will be addressed in the EIR.

11) <u>Energy/Natural Resources</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	_____	<u> X </u>	<u> X </u>
(b) Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	_____	<u> X </u>	_____

The project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulations and Chapter 82 of the San Francisco Administrative Code, “Resource Efficiency Requirements.” For this reason, and since the use of time clocks and occupancy sensors would provide more energy-efficient lighting than under existing conditions, the proposed project would not cause a wasteful use of energy. Therefore, energy-related effects would not be significant.

12) <u>Hazards</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	<u>TO BE DETERMINED</u>		
(b) Interfere with emergency response plans or emergency evacuation plans?	_____	<u> X </u>	<u> X </u>
(c) Create a potentially substantial fire hazard?	_____	<u> X </u>	<u> X </u>

This Initial Study section discusses potential impacts related to the use of hazardous materials, contamination that could be present in the soil where landside improvements would be constructed, and building materials that could be encountered during building renovation activities. As summarized below, these impacts are found to be less than significant with implementation of the measures specified and will not be discussed in the EIR prepared for the project. The EIR will discuss potential impacts related to disposal of sediments from the East Harbor which contain polynuclear aromatic hydrocarbons (PAHs). As discussed in the Water Quality section of this Initial Study, past sampling of the West Harbor sediments has indicated that they would be suitable for in-Bay disposal at the Alcatraz disposal site. Therefore, disposal of sediments from the West Harbor is addressed in the Water Quality section and not in this Hazards section.

POTENTIAL IMPACTS RELATED TO HAZARDOUS MATERIALS USAGE

Although the proposed project could result in a greater number of larger power and sail boats using the marina, the project would not result in a change in fuel storage requirements as there is sufficient storage capacity, even though there may be a potential negligible increase fuel deliveries or other hazardous materials used or hazardous wastes generated at the marina. However, storage, handling and use/disposal of hazardous materials and hazardous wastes would continue to comply with existing permits and all applicable hazardous materials/waste regulations. Therefore, impacts related to hazardous materials usage and hazardous waste generation at the marina would be less than significant.

The fuel concession at the East Harbor of the San Francisco Marina is operated by Gashouse Cove Marina, Inc. which leases the facilities from the City and County of San Francisco. Fuel at the dock is stored in a 10,000-gallon underground storage tank (UST) for unleaded fuel and a 12,000-gallon UST for diesel fuel. Both tanks are double walled and regularly monitored to detect potential leaks in accordance with a UST permit from the San Francisco Department of Public Health (SFDPH) (SFDPH, 2004a). Gashouse Cove Marina, Inc. has also prepared an emergency response plan specifying procedures to be followed in the event of an accidental release. Gas House Cove Marina, Inc, has had no violations of their UST permit, and over the past five years has updated their facility to reduce the total amount of USTs from five to two and has added an alarm system to monitor the UST system (Gashouse Cove Marina, Inc., 2004).

The used oil and oil filter recycling kiosk located at the East Harbor parking lot is operated by the Port of San Francisco under a permit from the SFDPH and the Port would continue its operation with implementation of the proposed project. The kiosk accepts used oil, used filters, bilge oil pads, and other hazardous materials such as batteries and solvents and is inspected annually by the SFDPH for compliance with hazardous materials regulations. The Port has prepared a Hazardous Materials Business Plan summarizing the hazardous materials stored at the facility and emergency response procedures to be followed in the event of an accidental release. The Harbor Office also provides free bilge oil pads to boaters along with educational materials.

The project would include refurbishment of two existing sewage pump out units (one in each harbor) to include oily water pump out facilities as well as the addition of a new oily water pump out unit in the West Harbor (Figure 3), resulting in two oily water pump out facilities in the West Harbor, and one in the East Harbor. Water from these facilities would be discharged to the combined sewer in accordance with a

discharge permit from the City and County of San Francisco. Separated oil would be collected in the pump out station and recycled or disposed of off-site by a licensed waste oil hauler. The proposed pump out facilities would improve ease of access by recreational boaters using the marina.

Other than small quantities of hazardous materials used for custodial services, the City and County of San Francisco uses no other hazardous materials at the San Francisco Marina, and the SFDPH has determined that operations by the City and County, excluding the used oil and oil filter recycling kiosk operated by the Port, are not subject to Hazardous Materials Unified Program Agency regulations (SFDPH, 2004b).

Therefore, impacts related to hazardous materials usage and hazardous waste generation at the marina would be less than significant because the proposed project would not result in a change in fuel storage requirements and only a potentially negligible increase fuel deliveries (due to an increase in potentially larger boats). Similarly, the project would not substantially change the amount of other hazardous materials used or generated at the marina. Storage, handling and use/disposal of hazardous materials and hazardous wastes would continue to comply with existing permits and all applicable hazardous materials/waste regulations. Implementation of Improvement Measure 2 specifying additional public outreach to encourage the use of the oily water pump out facilities, would provide an added measure to ensure that used oil is handled and disposed of or recycled correctly.

POTENTIAL IMPACTS RELATED TO SOIL AND GROUNDWATER CONTAMINATION

For this Initial Study, the potential to encounter hazardous materials in soil during construction of land-side improvements at the proposed project site was evaluated through a review of historic land uses at the project site and vicinity, as well as through identification of current permitted hazardous materials uses and environmental cases identified in the vicinity of the project. Environmental case files at SFDPH regarding a former leaking underground storage tank case at the marina were also reviewed.

If hazardous materials are present in the soil that would be excavated for expansion of the East Harbor restrooms and construction of the new maintenance facility, there is the potential that construction workers and the public could be exposed to hazardous materials during construction and the soil could require special handling and disposal requirements. The project sponsor would be required to complete a Phase I environmental site assessment described below under the subsection; *Potential Impacts Associated with Soil Excavation*.

Historic Land Uses and Fill Materials On-Site

The project site is almost entirely underlain by artificial fill dating from 1895 to 1906 and hydraulic fill deposits, deposited from 1912 to 1917 (Treadwell and Rollo, 1997). The artificial fill materials consist of dune sand, gravel, and rock. Hydraulic fill deposits are composed mostly of sand and silty sand dredged into their current locations from the Bay. The hydraulic fill deposits originated from the Bay during or after the time that adjacent land uses included heavy manufacturing, power generation, and a manufactured gas plant; therefore, the possibility exists that marina soils could contain elevated levels of hydrocarbons or other hazardous materials. Elevated levels of polynuclear aromatic hydrocarbons (PAHs) and other hydrocarbons have been detected in soil and groundwater sampled in sediments to be dredged from the East Harbor, as well as off-site properties, described below (Baseline, 1996; ABT, 1999; and Arthur D. Little, 2000).

Historic Land Uses and Fill Materials in the Project Vicinity

The adjacent parcels to the project site have accommodated a variety of historic land uses that may have resulted in subsequent soil and groundwater contamination on or near the project site. Historic land uses in the vicinity of the site include a manufactured gas plant operated by San Francisco Gas Light Company from 1891 to 1906; Phelps Manufacturing Company, a screw bolt manufacturing company that included a smithy and a forge; a ship smith facility; and a steam plant operated by the Sierra and San Francisco Power Company which had a 30,000 gallon crude oil tank (Baseline, 1996). A portion of the former manufactured gas plant site is currently occupied by a PG&E substation.

The former manufactured gas plant, historically located immediately across Beach Street, south of the East Harbor, is a potential source of hazardous materials in groundwater and sediment at the proposed project site because contaminants in groundwater may migrate to the project site and historic discharges from the plant to the East Harbor would have contained hazardous materials. Soil and groundwater data for the manufactured gas plant are discussed here to identify potential contaminants that could be encountered at the project site.

Based on a site history report prepared for the East Harbor (Baseline, 1996), a subsurface investigation at the PG&E substation located on the former manufactured gas plant site identified the following hazardous materials in the soil: polynuclear aromatic hydrocarbons, cyanide, fuel oil, benzene, toluene, ethylbenzene; xylenes, and phenols. Groundwater was encountered at a depth of 15 feet with a flow direction toward the north – northwest. This site is one of the manufactured gas plants discussed under Permitted Hazardous Materials Uses below, and has been the subject of the regulatory oversight as discussed below under Environmental Cases.

Permitted Hazardous Materials Uses and Environmental Cases

An environmental database review (EDR, 2004) was conducted to identify permitted uses of hazardous materials and environmental cases where soil and/or groundwater contamination may be present on-site or within a specified distance from the project site. The distances searched varied, depending on the type of regulatory database reviewed, and are consistent with Phase I Environmental Site Assessment standards.

Permitted Hazardous Materials Uses On Site

Gashouse Cove Marina, the fuel facility at the East Harbor, is identified in the Underground Storage Tank database indicating that this facility has permitted USTs. This facility is also identified in the CA FID and HIST UST databases indicating that there are historic USTs at this location. Existing and historic USTs at the fuel dock are described above under Potential Impacts Related to Hazardous Materials Usage. The database review also indicates that the San Francisco Department of Parks and Recreation has legally manifested hydrocarbon solvent wastes from the marina for off-site recycling and the San Francisco Department of Public Works has legally manifested contaminated soil from site cleanups for off-site disposal as well as oil-containing wastes and empty containers for off-site recycling.

Permitted Hazardous Materials Uses in the Project Vicinity

Because the use and handling of hazardous materials at currently permitted sites are subject to strict regulation, the potential for a release of hazardous materials from these sites is considered low unless

there is a documented chemical release in which case the site would be also tracked in the environmental databases as an environmental case. Permitted sites without documented releases are nevertheless potential sources of hazardous materials to the soil and/or groundwater because of accidental spills, incidental leakage or spillage that may have gone undetected. Historic permitted uses such as manufactured gas plant sites and historic UST sites may also be sources of contamination because the historic uses of hazardous materials were not well regulated. The number of permitted hazardous materials uses identified in the vicinity of the proposed project site is summarized in Table 7 along with the search distances used.

Table 7
Summary of Off-Site Permitted Facilities Using Hazardous Materials
in the Vicinity of the San Francisco Marina

Number of Facilities Identified	NAME AND DESCRIPTION OF REGULATORY LIST
5	RCRIS Small Quantity Generators (RCRIS SQG) – facilities permitted to generate more than 100 kilograms per month but less than 1,000 kilograms per month of non-acutely hazardous waste (0.25 mile search radius).
3	Facility Inventory Database (CA FID UST) – facilities on a historical listing of active and inactive USTs (0.25 mile search radius).
5	Hazardous Substances Storage Container Database (HIST UST) – facilities on a historic list of UST sites (0.25 mile search radius).
3	Dry cleaner related facilities (CLEANERS) (0.25 mile search radius).
4	Former Manufactured Gas Sites (Coal Gas) – sites that formerly manufactured gas (0.5 mile search radius).

* Some facilities may appear on more than one list.

Source: Orion Environmental Associates and Environmental Data Resources 2004.

Environmental Cases On Site

The San Francisco Marina is identified in the leaking underground storage tank (LUST) database and in the CORTESE database (EDR, 2004). The environmental database review indicates that there was a release of gasoline to the soil in 1998. Based on review of files available at the SFDPH on December 2, 2004, the site was placed in the Local Oversight Program in February of 1999 because analytical results for soil samples collected when the previous five USTs were removed in 1998 indicated that a release of petroleum had occurred. Although a formal tank closure report had not been prepared for the tank removal as of the date of the file review, inspection reports and laboratory reports available in the SFDPH files indicate that a total of nine soil samples were collected from the UST excavation at the time of tank removal. The samples contained total petroleum hydrocarbons; total recoverable petroleum hydrocarbons; and the metals chromium, nickel, and zinc. One soil sample from the UST excavation was analyzed for polychlorinated biphenyls (PCBs) and none were detected (Sequoia Analytical, 1999b).

A geotechnical and environmental investigation was conducted in 1997 to assess shoring requirements for the UST removal and the potential for petroleum-impacted soil associated with the tanks (Tetra Tech, 1997). Total petroleum hydrocarbons as gasoline and diesel; benzene, toluene, ethylbenzene, and xylenes; and methyl tertiary butyl ether (MTBE) were not detected in soil samples from three soil borings installed in the vicinity of the USTs. Unknown hydrocarbons, probably motor oil, were identified in each of the

samples. Groundwater was encountered at depths of approximately 13 to 15.5 feet below ground surface during this investigation.

In addition to the tank removals in 1998, the City and County of San Francisco removed 35 feet of underground pipeline in 2001 and during this removal a portion of the pipeline was abandoned in-place because it was overlain by an existing electrical box. No additional information regarding the pipeline removal was available in the SFDPH files.

Between 1990 and 1996, there were six reported spills at the San Francisco Marina (ERNS and CHMIRS databases). Of the five for which there is information available in the environmental database review, two included sheens on the water, one was a sunken boat, one involved an employee placing diesel in a dumpster, and one involved an unspecified release of diesel to the Bay. No reported spills were identified by the environmental database review after 1996.

Environmental Cases in the Project Vicinity

Environmental cases identified by the environmental database review are those sites in the project vicinity suspected of releasing hazardous materials or that have had cause for hazardous materials investigations and are identified on regulatory agency lists. Identification of hazardous materials at these sites is generally due to site disturbance activities such as removal or repair of an underground storage tank, a release of hazardous materials, or excavation for construction. The status of each environmental case varies and can be either active (on-going investigations or remediation), closed (remediation or clean-up completed and approved by the regulatory agency), or unknown.

There are a number of environmental cases in the vicinity of the project site provided in the database. Of particular note, Fort Mason is identified in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database and also in the Formerly Used Defense Sites Properties (FUDS) database indicating that the US Army is actively working on remediating the facility or will take the necessary cleanup actions. This facility is also identified in the LUST database indicating that a release from a UST has occurred. The California Department of Toxic Substance Control (DTSC) has determined that the PG&E substation at Bay and Buchanan Streets (described above under Historic Land Uses and Fill Materials) does not require direct Site Mitigation Program action or oversight (REF database). This site is also identified in the CERCLIS No Further Action Planned (CERCLIS NFRAP) database indicating that this site was previously identified for investigation under CERCLIS but designated for no further action.

The remaining environmental cases identified within the specified search distances are all leaking underground storage tank sites identified in the LUST database. These sites would typically have experienced a release of petroleum products from a UST to the soil and/or groundwater. Regulatory agency files for these sites were not reviewed for this analysis, and site specific conditions were not identified.

POTENTIAL IMPACTS ASSOCIATED WITH SOIL EXCAVATION

The proposed project would involve a limited amount of excavation for expansion of the East Harbor Restrooms (approximately 10 cubic yards) and the new maintenance facility (approximately 100 cubic

yards). The project site falls outside the boundary of the City and County of San Francisco Ordinance 253-86 (Maher Ordinance) and therefore, would not be subject to this ordinance.²⁴

The only documented location of soil contamination at the project site is the location of the previous USTs which are located at the fuel concession on the east side of the East Harbor. Based on the distance between the former USTs and the proposed construction location, it is not likely that soil quality at the restroom or planned maintenance facility locations has been affected by a release from the USTs.

However, based on historic land uses (including the former manufactured gas plant located to the south of the East Harbor) and filling activities within the project site as well as the number of environmental cases and permitted hazardous materials uses in the vicinity of the project site, there is a potential to encounter hazardous materials in the soil during construction of these facilities. If hazardous materials are present in the soil, construction workers and the public could be exposed to the contaminated soil and potentially also to chemical vapors during construction. Depending on the nature and extent of the contamination encountered and whether or not proper precautions are implemented, this could potentially cause adverse health effects and nuisance vapors. The soil and groundwater may also require disposal as a restricted or hazardous waste.

Because of the potential to encounter hazardous materials in the soil, the project sponsor would require a Phase I environmental site assessment as specified in Mitigation Measure 3, page 72, to further evaluate the potential for soil contamination at the construction site prior to construction of the proposed facilities. In accordance with this mitigation measure, a Phase II Environmental Site Assessment would be conducted, if warranted on the basis of the Phase I Environmental Assessment, to assess the presence and extent of contamination at the site and remediation would be conducted as necessary. Soil produced during construction would be legally disposed of at a permitted disposal facility. A site health and safety plan would also be prepared identifying methods that would be used to protect workers and the public from exposure to hazardous materials during construction. Implementation of this measure would reduce potential impacts related to exposure to hazardous materials in the soil to a less than significant level.

Given the limited depth of proposed earthmoving activities and the reported depth to groundwater of 15 feet at nearby sites, it is unlikely that groundwater would be encountered. Thus, no significant impacts associated with groundwater are anticipated.

POTENTIAL IMPACTS RELATED TO DISPOSAL OF DREDGED SEDIMENTS FROM THE EAST HARBOR

Construction dredging in the East Harbor would require removal of sediments to a depth of 8 to 12 feet to provide adequate depth for the boats using the harbor. Sampling indicates that all but 17,500 cubic yards of sediment would be suitable for in-Bay disposal. The remaining 17,500 cubic yards would require upland disposal based on total PAH concentrations greater than 5 mg/kg. Due to the public concerns over potential impacts, hazardous materials impacts related to upland disposal of these materials will be addressed in the EIR for this project.

²⁴ The Maher Ordinance encompasses the area of the City bayward of the original high tide line, where past industrial uses and fill associated with the 1906 earthquake and bay reclamation often left hazardous waste residue in soils and groundwater. The ordinance requires that soils must be analyzed for hazardous wastes if more than 50 cubic yards of soil are to be disturbed.

Disposal of sediments from the West Harbor is addressed in the Water Quality section and not in this Hazards section, as past sampling of the West Harbor sediments has indicated that they would be suitable for in-Bay disposal at the Alcatraz disposal site, and are therefore not considered a water quality hazard. Dredging in the West Harbor would occur under an existing dredging permit from the USACE.

POTENTIAL IMPACTS RELATED TO BUILDING MATERIALS

Lead-Based Paint

A survey for lead-based paint was conducted as part of a Phase I Environmental Site Assessment prepared for the Former Degaussing Station in 1997 (Baseline, 1997). Of the 14 samples of suspected lead-based paint, two samples of the exterior paint contained lead at concentrations greater than 1 milligram per square centimeter, the U.S. Department of Housing and Urban Development (HUD) threshold for lead-based paint. These samples were of the off-white surfaces on the exterior wood wall and the white exterior wall trim. All other interior and exterior painted surfaces did not contain lead above 1 milligram per square centimeter, although lead was identified at concentrations below this threshold in several interior and exterior samples. Lead-based paint may also be found in the Harbor Office (built in 1938, with modifications in 1963), East Harbor restroom (built in 1976), and West Harbor restroom (built in the late 1920s), all of which would be renovated and/or altered under the proposed project but have not had lead-based paint surveys conducted.

Remodeling work in these buildings must comply with Chapter 34, Section 3407 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove more than 10 total square feet of lead-based paint on the exterior of any building built prior to December 31, 1978, Chapter 34, Section 3407 requires specific notification and work standards and identifies prohibited work methods and penalties.

The code contains performance standards, including establishment of containment barriers that are at least as effective at protecting human health and the environment as those outlined in HUD guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used to remove lead-based paint. Any person performing work subject to Chapter 34, Section 3407 must make all reasonable efforts during the course of the work to prevent migration of lead-based paint contaminants beyond containment barriers, and any person performing regulated work must make all reasonable efforts to remove visible lead-based paint contaminants from regulated areas of the property prior to completion of the work.

Chapter 34, Section 3407 also includes notification requirements, information the notice should contain, and requirements for signs. Notification includes informing bidders of any paint-inspection reports that verify the presence or absence of lead-based paint in the regulated area of the proposed project. Prior to commencement of work, the responsible party must provide written notice to the Director of the Department of Building Inspection (DBI) of the location of the project; the nature and approximate square footage of the painted surface being disturbed and/or removed; anticipated job start and completion dates for the work; whether the responsible party has reason to know or presume that lead-based paint is present; whether the building is a residential or nonresidential, owner-occupied, or rental property; the approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill

any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager/cell number of the party who will perform the work. The ordinance contains provisions regarding inspection and sampling for compliance by the DBI, and enforcement, and describes penalties for noncompliance with the requirements of the ordinance.

Compliance with these regulations and procedures contained in the San Francisco Building Code would ensure that potential project-related impacts due to disturbance of lead-based paint would be reduced to a less-than-significant level.

Asbestos

A survey for asbestos-containing material was also conducted as part of the Phase I Environmental Assessment of the Former Degaussing Station in 1997 (Baseline, 1997). Asbestos was not detected above the laboratory reporting limit of one percent in the 28 samples of suspected asbestos containing materials analyzed for this survey, therefore asbestos abatement would not be required for the Former Degaussing Station. However, asbestos-containing materials may be present in other existing structures slated for renovation (i.e., West Harbor restrooms and office and East Harbor restroom). No previous asbestos surveys have been conducted for these buildings, but based on the year of construction of these buildings (between the late 1920s and 1976), asbestos-containing materials may be present.

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The Bay Area Air Quality Management District (BAAQMD) is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified 10 days in advance of any proposed demolition or abatement work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered, including size, age, and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, BAAQMD would inspect any removal operation about which a complaint is received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in Title 8 of the California Code of Regulations (CCR), Sections 152.9 and 341.6 through 341.14, where there is asbestos-related work involving 100 square feet or more of asbestos-containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a hazardous waste generator number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractors and haulers of the material are required to file a hazardous waste manifest that details the hauling of the material from the site and the disposal of such material. Pursuant to California law, the DBI would not issue the required permit until the applicant has complied with the notice and abatement requirements described above.

Compliance with these regulations and procedures, already established as a part of the permit review process, would ensure that any potential impacts due to public exposure to asbestos during removal of asbestos-containing materials would be reduced to a less-than-significant level.

Creosote

Wood pilings used in the East and West Harbor floating docks have been historically treated with creosote. Creosote is an effective marine wood preservative, but may contain organic compounds toxic to marine organisms. Ingestion of liquid creosote or creosote-laden materials, inhalation of liquid creosote vapors, or dermal contact with liquid creosote can be hazardous to human health. The proposed project would replace creosote-treated pilings with concrete pilings, which would result in a long-term reduction in the hazards posed by this material. Removal of timber piling during construction is not expected to create hazards to worker health and safety, as creosote would not be handled in a liquid form. Also, creosote concentrations in the pilings are likely to have decreased, since most were installed nearly 40 years ago. Under California law (Health and Safety Code §25143), the pilings would not be considered a hazardous waste, unless otherwise classified by federal regulations, and can be disposed of at an appropriately permitted composite-lined waste disposal facility. For the above reasons, the proposed removal of creosote-treated pilings would constitute a less-than-significant impact.

Polychlorinated Biphenyls (PCBs) and Other Building Materials

Existing electrical transformers and equipment or fluorescent light ballasts at the Harbor Office, former Degaussing Station, and existing restroom buildings may include PCB-containing oils. Spent fluorescent light tubes commonly contain mercury vapors at levels high enough to be considered a hazardous waste under California law; depending on the levels of mercury present, the light tubes may also be classified as hazardous under federal law. These and other potentially hazardous building materials could pose health threats for renovation workers if improperly handled. However, adherence to applicable laws and regulations for removal and disposal of these materials would reduce the potential for exposure to building materials during demolition activities. Therefore, this impact would be less than significant.

POTENTIAL IMPACTS RELATED TO INTERFERENCE WITH EMERGENCY RESPONSE PLANS OR EMERGENCY EVACUATION PLANS

The project would result in a negligible increase in activity at the proposed project site compared to existing conditions. New construction proposed for the maintenance facility and restrooms would not interfere with emergency response plans or emergency evacuation plans. Therefore, impacts related to interference with emergency response plans or emergency evacuation plans associated with construction and implementation of the project would be less than significant.

POTENTIAL IMPACTS RELATED TO FIRE HAZARDS

San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. The proposed project would conform to these standards. Therefore, the proposed project would have no significant impacts related to fire hazards.

13) <u>Cultural</u> - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
(a) Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study?	_____	<u> X </u>	<u> X </u>
(b) Conflict with established recreational, educational, religious or scientific uses of the area?	<u>TO BE DETERMINED</u>		
(c) Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?	<u>TO BE DETERMINED</u>		

This Initial Study section discusses potential impacts to prehistoric and historical archaeological resources, including submerged shipwrecks, related to proposed construction activities at the marina. As described below, these impacts are found to be not significant and will not be discussed in the EIR. The EIR will analyze potential impacts to historic architectural resources, including potential impacts to Pier One at Fort Mason, as well those subject to the provisions of Article 10 and 11 of the City Planning Code.

ARCHAEOLOGICAL RESOURCES

Prehistoric Archaeological Resources

The project site may contain subsurface prehistoric and historical archaeological resources that are potentially eligible for the California Register of Historic Resources. Early prehistoric resources may lie within San Francisco Bay submerged by sediment deposition and the rise in sea-level since the last period of glaciation. Most of the early and middle Holocene-age land surfaces once available for human occupation in the Bay Area have been buried or submerged since 13,000 years B.P. (Before the Present). The sea level 6,000 years ago, for example, was approximately 20 to 39 feet lower than present. At the beginning of the current era (c. 1 A.D.) the sea level was seven to 13 feet lower than present, indicating that currently submerged sub-bottom soils within the project site may represent potential living surfaces dating up to as recently as 2,000 years ago. The land available for human occupation and exploitation 2,000 to 12,000 years ago was vastly more extensive than that of the San Francisco peninsula today extending as far west as the Farallon Islands. A number of Bay Area archaeological sites support the theory of deeply buried evidence of early prehistoric occupation. For example, human skeletal remains (CA-SFr-28) dated at approximately 5,000 years B.P. were discovered nearly 75 feet below the existing surface during construction of the Civic Center BART station. That some of the early prehistoric sites were historically submerged is evidenced by the discovery of submerged shell middens and of Native American human remains in the Bay dredging conducted for the construction of Treasure Island. Approximately 50 percent of the prehistoric archaeological sites in the Bay Area with dates greater than 3,000 years B.P. are found more than 13 feet below the surface. Early Paleo-Indian or Paleoamerican archaeological sites although infrequently encountered are highly significant to a wide range of current research topics and debates and, thus, eligible for listing to the California Register.

Historical Archaeological Resources

During the historic period, many Gold Rush-era ships sank in the Bay and along the San Francisco's historic shoreline margins. Known shipwrecks outside of, but in the general vicinity of the Marina, include the *Tonquin* (sunk in 1849) and, possibly, the *Carlota* (sunk in 1850). Submerged shipwrecks may be eligible for listing in the California Register under Criterion A (association with a locally, regionally, and nationally significant historical event, the California Gold Rush); Criterion C (significance to Naval Architecture for information regarding wood ship construction in the period prior to the trade practice of developing pre-construction plans); and under Criterion D (significant maritime historical/archaeological research value) as a contributor to the *California Gold Rush Shipwrecks Thematic Group* (Delgado, 1987), which is listed on the National Register of Historic Places. There are no known shipwrecks in this area, and because this marshy area was extensively reconfigured, filled and then dredged for the PPIE there is a very limited chance (if any) of encountering any significant cultural materials.²⁵ The State Lands Commission has also indicated that all known maritime archaeological resources are located well outside of the project's area of potential effect (State Lands Commission, 2004). As a result, proposed pile driving or dredging activities are not expected to impact known submerged archeological resources. Nevertheless, because such discoveries are possible, the project sponsor would implement Mitigation Measure No. 4 (page 73) to reduce potential impacts to submerged archaeological resources to a less-than-significant level.

The project area was historically within San Francisco Bay in a large cove situated between two former islands named San Jose or Blackpoint Island and Strawberry Island, neither of which exist today. During historic times, the Marina Green and the West Harbor were built in anticipation of 1915 Panama-Pacific International Exposition (PPIE), or World's Fair. The East Harbor, in what was once known as Gashouse Cove, was constructed in the mid-1960s. The current land mass occupied by the Marina Green was created by pumping sand from the Bay to form the northern portion of the 635-acre setting for the Panama-Pacific Exposition²⁶. The Marina Green was called the "North Gardens" at the fair, and it became a city park in the 1920s. While the City has undertaken improvements at the West Harbor over the years, the area now occupied by the West Harbor appears relatively unchanged from the "Boat Harbor" shown on maps of the Panama-Pacific International Exposition²⁷. Ferries bringing visitors to the fair docked at the outer edge of Gashouse Cove. The area inland from the cove was occupied by the San Francisco Gas Light Company and was excluded from the fairgrounds.

The project would involve very limited land-side excavation, both in terms of depth and area, for the expansion of the existing East Harbor restroom and the construction of an adjacent maintenance building. Excavation would total up to about 110 cubic yards, to a depth of about 2½ feet. Because of the limited depth and extent of excavation, and because this area was constructed of sandy fill during the twentieth century, the likelihood that significant archaeological resources would be encountered during construction is very low. Nevertheless, because such discoveries are possible, the project sponsor would implement Mitigation Measure No.4 (page 73) to reduce potential impacts to archaeological resources to a less-than-significant level.

²⁵ Delgado, Jim, Executive Director, Vancouver Maritime Museum, personal communication, October 30, 2004.

²⁶ viewed October 13, 2004: <http://www.sanfranciscocomemories.com/ppie/panamapacific.html>.

²⁷ *ibid*

Cumulative Impacts

There are three recorded archaeological resources in the project vicinity located within Fort Mason, as well as numerous resources identified within the San Francisco Presidio. Given the project's proximity to these areas, there could be previously unrecorded archaeological resources anywhere on the project site. In addition, previously unrecorded submerged archaeological resources may exist in the project vicinity. Although highly unlikely, accidental discovery of such resources during project construction, combined with other construction projects at Fort Mason or the Presidio, could create potentially significant indirect cumulative impacts to archaeological resources. Because such discoveries are possible, the project sponsor would implement Mitigation Measure No.4 (page 73) to reduce potentially significant cumulative impacts to archaeological resources to a less-than-significant level.

C. OTHER - Could the Project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
Require approval and/or permits from city departments other than the Department of City Planning or Department of Building Inspection, or from regional, state, or federal agencies?	<u>X</u>	_____	<u>X</u>

Most of the regional, state, and/or federal approvals required for this project are related to water-side project improvements (dredging, placement of new breakwaters, etc.). Required permits would include a Major Permit from BCDC, a Section 404 permit and Section 10 permit from the USACE, and a Section 401 Water Quality Waiver or Certification from the RWQCB. The USACE must consult with the USFWS, NOAA Fisheries, and CDFG in the Section 404 permitting processes as to the likelihood that project activities, including construction of breakwaters, would affect state or federally listed species or their habitat. The USACE would also solicit input from the U.S. Environmental Protection Agency regarding Clean Water Act compliance. Dredging activities would be reviewed by the California State Lands Commission to determine if such activities would occur on state-owned lands, were consistent with the public trust, and/or were subject to royalty fees for mineral extraction. The DMMO would review the application for East Harbor dredging (and has previously reviewed the application for West Harbor dredging) and would review all dredging sampling plans and results. The project would also undergo National Environmental Policy Act compliance review, since federal permits would be issued for project activities.

State approval of any grant funding would be determined by the California Department of Boating and Waterways. Project implementation would also require approvals from the San Francisco Recreation and Parks Commission and Arts Commission.

D. CUMULATIVE PROJECTS

Seven substantial projects are currently in various stages of planning or environmental review in the vicinity of the San Francisco marina. They are: 1) the Fort Mason Center Long Term Lease, 2) the Doyle Drive Replacement Project, 3) the Muni E-Line Extension to Fort Mason, 4) the Presidio Trust Management Plan (PTMP), 5) the Crissy Field Marsh Expansion, 6) the Tennessee Hollow Restoration Project, and 7) the Ferry Access Study. Each of these projects is described below. Discussion of

cumulative impacts is provided within the various topical sections above, as appropriate. The EIR will also address cumulative impacts for those environmental topics to be discussed in the EIR.

Fort Mason Long Term Lease

The Fort Mason Center (FMC) houses nearly forty nonprofit organizations and is the setting for more than 15,000 meetings, conferences, performances, and special events attended by 1.6 million visitors each year. The FMC is currently operated under a cooperative agreement between the Fort Mason Foundation (FMF) and the NPS that expired in March 2004. Under the long-term lease of up to 60 years between the NPS and FMF, the FMF would continue to manage the FMC as it has since 1977. The lease term would be longer than the current 20-year cooperative agreement, and would shift some responsibilities from the NPS to FMF. Most notably, the long-term lease would shift responsibility for parking management and full building maintenance, excluding the substructures of the piers and Building E, from the NPS to FMF and allow FMF to renovate and use Pier One. It is anticipated that Pier One would contain about 44,000 square feet of space usable space for food service, gift shops, and museum/cultural space consistent with the other uses at the Fort Mason Center. Seismic improvements to Pier One's substructure would remain the responsibility of the NPS. Pier One renovations would add about 14.5 percent to the total available square footage at Fort Mason and construction would be phased over 7 to 10 years. After completion, visitor levels of the total FMC complex could be expected to increase from 1.6 million to about 1.9 million annual visitors. The Fort Mason Long Term Lease Environmental Assessment (EA) was completed in August 2003 (NPS, 2003). A Finding of No Significant Impact (FONSI) adopted in March 2004 (NPS, 2004).

Doyle Drive Replacement Project

Doyle Drive, located in the Presidio of San Francisco and within the GGNRA, is a 1.5 miles-long viaduct linking the City of San Francisco and the San Francisco Peninsula with the Golden Gate Bridge, Marin County and points north. The San Francisco County Transportation Authority (SFCTA) working with the Federal Highway Administration (FHWA) and Caltrans is proposing to replace Doyle Drive to improve the seismic, structural, and traffic safety of the roadway. The project area extends from the Golden Gate Bridge Toll Plaza on the west to Broderick Street on the east and includes Richardson Avenue, Gorgas Avenue and Marina Boulevard up to Broderick Street. The study area abuts the western edge of the San Francisco Marina near the intersection of Marina Boulevard and Lyon Street. Up to five design alternative are being considered, none of which would increase the capacity of the roadway, but would improve traffic safety and change circulation. A joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) document is to be completed in mid-2005. Construction of the project is proposed to begin in 2008 and finish in 2013.

Muni E-line Extension to Fort Mason

The success of the Muni F-line to Fisherman's Wharf has led several groups to investigate an extension to serve various historic attractions and destinations beyond the current terminus at Beach and Jones Streets, including Aquatic Park, the National Maritime Museum, the Fort Mason Center and the Presidio. The proposed extension would be part of the "E-Embarcadero" historic streetcar line and a restoration of rail service which had existed in this location historically, from the Embarcadero to the east, under Fort

Mason in an existing tunnel, and ending at the Presidio to the west. As conceived by the project sponsors (Muni, Presidio Trust, NPS/GGNRA, and NPS/San Francisco Maritime National Historical Park), Phase 1 of the E-line extension would run from its current terminus at Jones Street to Fort Mason, using the historic railroad tunnel beneath Fort Mason to reach a new western terminus near the intersection of Laguna and Beach Streets (Wilbur Smith Associates, 2004). Phase 1 contains two Muni turnaround concepts at the end of the Fort Mason Tunnel; one within Fort Mason property, the other on city property. The latter concept would remove some of the parking to the south of Marina Boulevard in the East Harbor parking lot. Phase 2 of the project would extend the E-Line further west to the Presidio either along Marina Boulevard entirely, or along Beach and Cervantes Streets and a shorter stretch of Marina Boulevard. A draft feasibility study for the E-line extension has been completed to date, with a final report due by the end of 2004. Next steps include a seismic evaluation of the Fort Mason tunnel in spring 2005, and initiation of the environmental review process in 2005. The project construction dates are unknown, however both phases of the project would not likely be completed until 2010 at the earliest.

Presidio Trust Management Plan

The 1,490-acre Presidio of San Francisco borders the project site to the west. In July 2001, the Presidio Trust published the Presidio Trust Management Plan (PTMP), a master plan that provides a framework for future land use and development decisions within the Presidio (PTMP, 2001). The master plan includes reducing the portion of the park covered by buildings from almost 6 million square feet to 5.6 million square feet within 20 years; increasing open space in the area under the Trust's control from 696 acres to 793 acres; providing 1,300 on-site housing units (through new construction and adaptive reuse of existing buildings); developing new visitor-serving uses (hotels, cultural, and educational uses); and restoring habitat. Proposed land uses in the immediate vicinity of the project site (south of Mason Street and east of Lyon Street) include museums, lodging, recreation, and educational facilities. The Plan calls for an increase in the total land uses and the amount of employee and visitor activity at the Presidio. The final state and federal environmental documentation on the Trust's management plan was certified on August 23, 2002. Since this time, the PTMP has been the guiding framework for a number of park projects, some of which will include additional planning, review, and public input. Some of these projects that are currently underway or are now being completed include the Letterman Complex, the Crissy Field Marsh Expansion Project, the Tennessee Hollow Watershed Project, and the Vegetation Management Plan (some of which are described further below).

Crissy Field Marsh Expansion

Tidal action was introduced into a restored, 20-acre tidal marsh at Crissy Field in 1999. In May 2001 natural closure and breaching of the marsh occurred due to sand deposition in the inlet channel, which has continued to close and reopen intermittently since then. The Final Crissy Field Marsh Expansion Study estimated the minimum area required to maintain continuous tidal function of the Crissy Field Marsh and evaluated the potential for closure for an incrementally enlarged wetland (Phillip Williams And Associates, Ltd., 2004). According to the analysis, continuous tidal action could be achieved if the size of the lagoon were increased from its present 17 acre-feet (ac-ft) to approximately 56 ac-ft. The study also concluded that the precise geometry of an expanded wetland would need to be studied further, and that changes to the shape of East Beach are expected following wetland expansion. This project is in the planning stages, and no environmental review has been completed at this time.

Tennessee Hollow Watershed Project

The Tennessee Hollow Watershed is a 270-acre watershed in the southeastern portion of the Presidio and one of the primary freshwater sources for the recently restored Crissy Field Marsh. The Presidio Trust has initiated public scoping of the Tennessee Hollow Watershed Project to establish a comprehensive watershed-based approach to habitat restoration, resource management and enhancement, and identify opportunities for public interpretation and enjoyment of this watershed (Phillip Williams And Associates, Ltd. 2000). This project is in the planning stages, and no environmental review has been completed at this time.

Ferry Access Study

The San Francisco Bay Water Transit Authority (SFWTA) is a regional agency established by the California Legislature to undertake a water shuttle planning effort to establish the desirability of water access to park sites in San Francisco Bay to help solve the region's worsening traffic congestion (SFWTA, 2001). This effort is building upon past park plans for ferry service access and recent interest in increasing alternative access to park sites. The Authority has identified a number of potential water transit terminal sites, one of which may be located at the Fort Mason Center. The process of data collection, survey development, market analyses, development and evaluation of alternatives, and preparation of recommendations is ongoing. The SFWTA intends to prepare a programmatic Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to evaluate the potential environmental effects of the program, and has published an Initial Study checklist in October, 2001, identifying key environmental issues of the potential project. To date, a public scoping meeting was held on January 13, 2005 for the South San Francisco Ferry Draft Environmental Impact Report/ Environmental Assessment (SFWTA, 2005).

E. MITIGATION, IMPROVEMENT, AND OTHER MEASURES

	<u>YES</u>	<u>NO</u>	<u>N/A</u>	<u>DISCUSSED</u>
1) Could the project have significant effects if mitigation measures are not included in the project?	<u> X </u>	<u> </u>	<u> </u>	<u> X </u>
2) Are all mitigation measures necessary to eliminate significant effects included in the project?	<u> X </u>	<u> </u>	<u> </u>	<u> X </u>

In the course of project planning and design, measures have been identified that would reduce or eliminate potential significant environmental impacts of the project. Measures discussed below are divided into two categories: (1) mitigation measures that would avoid potentially significant impacts, and (2) improvement measures proposed to improve project impacts (even though those impacts would be less than significant). The EIR will include additional mitigation measures to reduce or eliminate potentially significant impacts.

MITIGATION MEASURES

The following mitigation measures, all of which are necessary to avoid potential significant effects of the project, have been agreed to by the project sponsor.

Mitigation Measure 1 – Noise

The project sponsor shall require the construction contractor(s) to use state-of-the-art noise shielding and muffling devices on pile-driving construction equipment and limit pile-driving activity to the hours between 7 a.m. and 8 p.m., Monday through Friday. The construction contractors shall notify residences fronting Marina Boulevard, from Baker Street to Casa Way and from Webster Street to Laguna Street. Businesses at the Fort Mason Center shall also be notified prior to the start of construction. The notification shall provide the approximate times of construction and a phone number for any additional questions about construction, or to register complaints regarding construction activities, including noise levels. Pile driving activities in the East Harbor shall also be prohibited during the lunchtime hours from 11:30 a.m. to 1:30 p.m. to reduce impacts to Green’s Restaurant, and shall cease during scheduled daytime events at the Fort Mason Center. The San Francisco Department of Public Works shall also coordinate pile driving construction schedules in the East Harbor with Fort Mason and its proposed renovations to Pier One. Coordination shall include meetings, phone calls, or other discussions with the Fort Mason Center, to be initiated by the San Francisco Department of Public Works, prior to finalization of the city’s construction schedule for the proposed East Harbor breakwater.

Other measures to reduce noise associated with pile driving activities shall include the following:

- Implement “quiet” pile-driving technology (such as pre-drilling of piles, water-jetting, resonance-free vibratory hammers, and the use of more than one pile-driver to shorten the total pile-driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions;
- Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings such as Building A at Fort Mason, such as the installation of noise-absorbent baffling or other barrier-type material to be placed at strategic locations on the western side of Building A.

Mitigation Measure 2 – Construction Air Quality

The following control measures recommended by the BAAQMD shall be implemented during construction:

- All exposed soils shall be watered at least twice daily during construction. Watering shall be sufficient to prevent airborne dust from leaving the site. Increased watering frequency shall occur, as necessary, whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used for site watering, if available.
- All trucks hauling soil, sand, and other loose materials shall be covered, or at least 2 feet of freeboard shall be maintained (i.e., the minimum required space between the top of the load and the top of the trailer).
- All paved access roads, parking areas, and any paved areas used for staging shall be swept daily (using reclaimed water, if possible).

- At the end of each day, if visible soil material is carried onto nearby paved roads, streets shall be swept (using reclaimed water, if possible).
- Construction vehicles shall use paved roads to access the construction site wherever possible.

Mitigation Measure 3 – Environmental Site Assessments and Health and Safety Plan

Prior to the start of construction, the project sponsor would retain a qualified professional (e.g., a California-registered environmental assessor) to conduct a Phase I environmental site assessment for the landside areas of the proposed project site. The assessment would conform with standards adopted by the (ASTM) for Phase I environmental site assessments and would identify land uses that currently or historically have stored or generated hazardous materials and evaluate whether releases of hazardous materials have occurred that could affect soil or groundwater quality at the site. The assessment would include recommendations for further investigation of the site, if necessary.

If the Phase I environmental site assessment were to indicate that a release of hazardous materials could have affected soil quality at the site, the project sponsor would retain a qualified environmental professional to conduct a Phase II Environmental Site Assessment to assess the presence and extent of contamination at the site, in conformance with state and local guidelines and regulations.

If the sampling identifies surface and/or subsurface contamination in areas subject to ground disturbance during construction, the area would be remediated in accordance with the standards, regulations, and determinations of local, state, and federal regulatory agencies. The project sponsor would coordinate with the San Francisco Department of Public Health and any other applicable regulatory agencies to adopt contaminant-specific remediation target levels. The excavated soil would be removed and disposed of at an approved disposal facility.

All reports and plans prepared in accordance with this mitigation measure shall be provided to the San Francisco Department of Public Health and to any other appropriate agencies identified by the Department of Public Health. When all hazardous material have been removed from existing buildings, and soil and groundwater analysis and other activities have been completed, as appropriate, the project sponsor shall submit to the San Francisco Planning Department and the Department of Public Health (and any other agencies identified by the Department of Public Health) a report stating that the mitigation measure has been implemented. The report shall describe the steps taken to comply with the mitigation measure and include all verifying documentation. The report shall be certified by an REA or similarly qualified individual who states that the mitigation measure has been implemented, and specifying the actions that have been implemented.

Potential hazards to construction workers and the general public associated with potential exposure to hazardous materials in soils or groundwater during construction would be mitigated by the preparation and implementation of a site-specific health and safety plan. The health and safety plan would meet the requirements of federal, state and local environmental and worker safety laws. Specific information to be provided in the plan includes identification of contaminants, potential hazards, material handling procedures, dust suppression methods, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment to be used during construction to

verify health and safety of the workers and the public, measures to protect public health and safety, and emergency response procedures.

Mitigation Measure 4 – Archaeological Resources

The following mitigation measure is required to avoid potential adverse effects due to the accidental discovery of buried or submerged historical resources, as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archaeological resource ALERT sheet to the prime contractor; to any subcontractor(s) (including firms hired to perform demolition, excavation, grading, foundation, pile driving, etc.); and to any utilities providers involved in soil- or bay bottom-disturbing activities at the project site. Prior to any soil- or bay bottom- disturbing activities, each contractor is responsible for circulating the ALERT sheet to all field personnel, including machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities providers) confirming that all field personnel have received copies of the Alert sheet.

In the event that evidence of an archaeological resource is encountered during soil- and bay bottom-disturbing activities, the head foreman and/or project sponsor shall immediately notify the ERO and shall suspend soil- or bay bottom- disturbing activities in the vicinity of the discovery until the ERO in consultation with the California State Lands Commission (CSLC) has determined what additional measures should be undertaken.

If the ERO in consultation with the CSLC determines that an archaeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archaeological consultant. The archaeological consultant shall advise the ERO as to whether the discovery is an archaeological resource, retains sufficient integrity, and is of potential scientific, historical, or cultural significance. If an archaeological resource is present, the archaeological consultant shall identify and evaluate the resource. The consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO in consultation with the CSLC may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include in-situ preservation of the archaeological resource or an archaeological evaluation program. If an archaeological evaluation program is required, it shall be consistent with the Major Environmental Analysis division of the Planning Department guidelines for such programs.

The project archaeological consultant shall submit a Final Archaeological Resources Report (FARR) to the ERO and the CSLC that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate, removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO and the CSLC for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey, Northwest Information Center shall receive one copy, and the ERO shall receive one copy of the FARR. The Major Environmental Analysis division and the CSLC shall receive two copies of the FARR,

along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation pertaining to NRHP/CRHR eligibility. In instances of high public interest or interpretive value, the ERO and the CSLC may require a different final report content, format, and distribution than that presented above.

IMPROVEMENT MEASURES

Improvement Measure 1 – “Dry Firing” During Pile Driving

Prior to any pile driving, contractors shall “dry fire” before commencing pile driving if marine mammals are identified within 150 feet of the work area. The U.S. Coast Guard Pier in Monterey, California, has employed dry firing to “herd” California sea lions away from worksites during the installation of piles. A dry fire occurs when the hammer is raised and dropped without compressing the pistons, which produces approximately 50 percent of the maximum in-air noise level. This technique allows pinnipeds to voluntarily move from the area before the hammer is operated at full capacity, and should expose fewer animals to loud sounds both underwater and above water.

Improvement Measure 2 – Public Education Activities

The project sponsor shall conduct public education activities to inform people of harbor rules and the importance of protecting water quality within the marina. As part of this program, signs shall be posted at locations accessible to marine tenants and the visiting public. The signs shall describe the location and encourage the use of sewage and restroom facilities, oily water pumpout facilities, and the used oil and oil-filter recycling kiosk. The program shall educate tenants about potential water quality impacts related to the use of cleaners, solvents, and paints for boat cleaning and maintenance; encourage tenants to restrict the use of these materials; provide information about more environmentally sound alternatives to the use of these materials; and encourage tenants to minimize underwater hull cleaning and maintenance.

IV. ALTERNATIVES

The EIR will analyze alternatives to the project that would reduce or eliminate any significant environmental effects. These alternatives are expected to include:

1. No Project Alternative. The existing marina would operate in its current configuration and capacity, and would continue to deteriorate due to wave action from the San Francisco Bay.
2. Modified Project Alternatives. Some of the improvements to the marina under the proposed project may be modified or eliminated under various other alternatives, including no new breakwaters in the West Harbor, renovations to the West Harbor only, and removal of the Degaussing Station.

G. MANDATORY FINDINGS OF SIGNIFICANCE

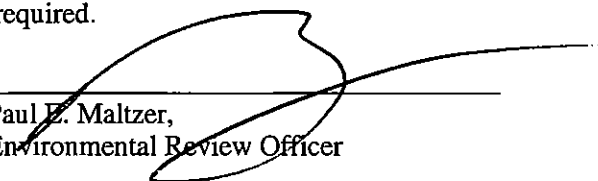
YES NO DISCUSSED

- | | | | |
|---|--------------|--------------|--------------|
| 1) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | <u> X </u> | <u> — </u> | <u> X </u> |
| 2) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? | <u> — </u> | <u> X </u> | <u> — </u> |
| 3) Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.) | <u> X </u> | <u> — </u> | <u> X </u> |
| 4) Would the project cause substantial adverse effects on human beings, either directly or indirectly? | <u> — </u> | <u> X </u> | <u> — </u> |

The EIR will analyze potential impacts to the environment from dredging operations, visual and aesthetic concerns, effects to historic resources, and potential cumulative impacts related to these topics.

H. ON THE BASIS OF THIS INITIAL STUDY

- I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.
- I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because Mitigation Measures in the discussion above have been included as part of the proposed project. A MITIGATED NEGATIVE DECLARATION will be prepared.
- X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.


 Paul E. Maltzer,
 Environmental Review Officer

for

Dean Macris
 Director of Planning

March 18, 2005
 DATE

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APPENDIX A
AIR QUALITY EMISSIONS CALCULATION WORKSHEETS

AIR QUALITY EMISSIONS CALCULATION WORKSHEET
San Francisco Marina Renovation

2005 Emissions

TYPE	ID fuel /engine type	Total Boattrips per day (see 1)	Percent of Fleet (see 3)	Total Fleet Mix (see 3)	Boats Per Category (see 3)	Assumed horsepower (HP)	Load Factor	Hours Per Day (see 3)	NOX		ROG		PM10		
									g/bhp/hr (see 4)	Total lb/day (see 5)	g/bhp/hr (see 4)	Total lb/day (see 5)	g/bhp/hr (see 4)	Total lb/day (see 5)	
Sailboats (<40 ft)	1a gas/2-stroke	4.9	24.5	164	2.40	50	0.32	1	1.6	25.6	0.1	129	2064	7.1	113.6
Sailboats (<40 ft)	1b diesel/2-stroke	4.9	24.5	163	2.40	50	0.32	1	1.6	25.6	0.1	129	2064	7.1	113.6
Sailboats (>40 ft)	2 diesel/4-stroke	2.8	14	94	0.39	100	0.32	1	11.3	361.6	0.3	2.6	83.2	0.34	10.88
<25 ft Motor Boats	3 gas/2-stroke	2.8	14	94	0.39	100	0.32	6	1.1	35.2	0.2	117	3744	7.1	227.2
26-39 ft Motor Boats	4 gas/4-stroke	3	15	98	0.45	150	0.32	6	5.4	259.2	1.5	9.1	436.8	0.07	3.36
>40 Motor Boats	5 diesel/4-stroke	1.6	8	55	0.13	250	0.35	6	11.3	988.75	1.7	2.6	227.5	0.34	29.75
Total		20	100	668	6.2				Total=	4.0	4.0	Total=	44.2	Total=	3.4

2010 Emissions

TYPE	ID fuel /engine type	Total Boattrips per day (see 1)	Percent of Fleet (see 3)	Total Fleet Mix (see 3)	Boats Per Category (see 3)	Assumed HP	Load Factor	Hours Per Day (see 3)	NOX		ROG		PM10		
									g/bhp/hr (see 4)	Total lb/day (see 5)	g/bhp/hr (see 4)	Total lb/day (see 5)	g/bhp/hr (see 4)	Total lb/day (see 5)	
Sailboats (<40 ft)	1a gas/2-stroke	3.4	17	112	1.2	50	0.32	1	1.6	25.6	0.1	129	2064	7.1	113.6
Sailboats (<40 ft)	1b diesel/2-stroke	3.4	17	111	1.2	50	0.32	1	1.6	25.6	0.1	129	2064	7.1	113.6
Sailboats (>40 ft)	2 diesel/4-stroke	5.4	27	173	1.5	100	0.32	1	11.3	361.6	1.2	2.6	83.2	0.34	10.88
<25 ft Motor Boats	3 gas/2-stroke	1	5	30	0.1	100	0.32	6	1.1	35.2	0.0	117	3744	7.1	227.2
26-39 ft Motor Boats (see 2)	4 gas/4-stroke	3.8	19	125	0.7	150	0.32	6	5.4	259.2	2.5	9.1	436.8	0.07	3.36
>40 Motor Boats	5 diesel/4-stroke	3	15	101	0.5	250	0.35	6	11.3	988.75	5.9	2.6	227.5	0.34	29.75
Total		20	100	652	5.0				Total=	9.7	9.7	Total=	18.8	Total=	1.0

Project Contribution (lbs/day)= **NOX 5.68** **ROG -25.48** **PM10 -2.44**

NOTES:

- Daily Usage = 20 trips per day all boat types
 Hourly usage = 1 hour for sailboats per trip or 30 minutes entering and 30 minutes exiting harbor. Other than enter/ exit and some maneuvering, mostly sailing.
 and 6 hours for powerboats per trip
- The 2010 proposed project <40 feet in length boats includes 24 trailered power boats --- 652=628+24 trailered boats
 Usage hours per day is equivalent to percent fleet mix (37% for powerboats and 63% for sailboats) * (total usage hours per day)
- Source: personal communication and information from Brad Gross, San Francisco Marina Harbormaster, with Cynthia Wren, Environmental Science Associates, various dates.
- Emission factors from California Air Resource Board Proposed Pleasure Craft Emissions Inventory, July 9, 1998.
- g/hr = g/bhp/h*load factor*HP
- lbs/day = g/hr*hrs/day*boats per category*conversion factor
 conversion factor (grams to pounds)
0.0022046

APPENDIX B

EAST HARBOR DESIGN GUIDELINES

EAST HARBOR DESIGN GUIDELINES

INTRODUCTION

The *Cultural Landscape Report for Fort Mason, Golden Gate National Recreation Area* describes Lower Fort Mason as “Shaped by the functional requirements of both rail and ship transportation. [...] Vehicular access into Lower Fort Mason via Laguna Street was controlled by a gatehouse placed at the reservation boundary. Roads and rail lines were designed to accommodate heavy traffic... Bituminous pavement covered the ground surface at Lower Fort Mason—vegetation was not an element of the landscape there.”¹ This characterization of Lower Fort Mason as essentially an industrial, cultural landscape is supported by the *San Francisco Port of Embarkation, Historic Structure Report*, prepared in 1991: “This historic district retains the semblance of a military installation with the utilitarian structures orderly positioned on the site for maximum efficiency. [...] Given the industrial character of Lower Fort Mason, plants would be inappropriate in the paved exterior areas of the site.”²

The *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* sets forth guidelines for the rehabilitation of cultural landscapes. Four sections of the rehabilitation guidelines address Alterations/Additions for the New Use. Although these are mainly applicable to treatments proposed for a cultural landscape, they are also applicable when considering treatments immediately adjacent to and within the sphere of influence of the cultural landscape. The four sections, with their associated recommended treatments, are as follows:

Spatial Organization and Land Patterns. Designing new features when required by the new compatible use to assure the preservation of the historic spatial organization and land patterns.³

Topography. Designing a new vegetation feature when required by the new compatible use to assure the preservation of the historic character of the landscape.⁴

Circulation. Designing and installing compatible new circulation features when required by the new use to assure the preservation of the historic character of the landscape.⁵

Structures, Furnishings and Objects. Designing and installing a new structure, furnishing or object when required by the new use, which is compatible with the preservation of the historic character of the landscape.⁶

The East Harbor is characterized by utilitarian structures and landscaping related to the function of the Marina. Park-like landscaping appears at its western edge, where it abuts the Marina Green. The utilitarian quality of the area is defined by driveways, a parking lot for automobiles and boat trailers, a boat hoist, corrugated metal recycling sheds, an

existing breakwater and boat slips that are adjacent to Lower Fort Mason. The approach to and from Lower Fort Mason uses the driveways of the East Harbor. The view to and from the Lower Fort Mason west entrance encompasses this utilitarian scene, which is in character with the industrial nature of the historic resource.

Further to the west are landscaped areas characterized by lawn, trees and the existing public restrooms. This area affords the East Harbor a transition zone to the Marina Green. It is in the line of sight when entering the East Harbor area from Marina Boulevard, but is left behind as one proceeds toward Lower Fort Mason. It is in the background of the view from Lower Fort Mason.

DESIGN GUIDELINES

These guidelines are for those elements of the proposed San Francisco Marina Renovation project that are within the East Harbor. They are intended to guide the design of these elements with respect to materials, scale, texture, site relationships, color, and architectural character. The guidelines were prepared in collaboration with NPS/GGNRA staff.

Scale

The vertical scale of the East Harbor area is generally defined as no more than one story in height. At the adjacent portion of Lower Fort Mason, the Pier 1 shed sets the highest vertical scale at the northeast (two stories) as well as Building A (one story), while the existing scale at the south, southeast and west is essentially one of parking lots and landscape features combined with the Lower Fort Mason entry gate and wall.

The proposed improvements do not appear to alter the scale of the area. The new boat hoist should be substantially the same or similar in height and bulk (note that it is currently an open framed structure). Boat docks and slips should be constructed low to the water. As well, the proposed breakwater should be kept low to the water. The proposed maintenance shed and restroom addition should be limited to one story. The facilities should be located near the existing restroom, which is about 800 feet from Lower Fort Mason.

Texture

Small scale elements, such as bollards, walls, landscape features, pavement, boats, breakwaters, gates, small buildings and a variety of existing features give depth and texture to this landscape. The proposed project intends to replace existing elements with new, such as the docks, slips, and boat hoist. Other elements, such as the temporary parking for boat trailers, existing automobile parking, and landscape features, will remain without notable changes. The corrugated metal recycling sheds should be removed in this area to reduce visual clutter. New elements include the maintenance building, addition to the existing restrooms, breakwater and boat access ramp.

Through the application of the other guidelines, the changes above should be managed so that the overall effect of the landscape is not materially changed. With implementation of the guidelines, the overall depth and texture of the East Harbor should be retained as well as its relationship to Lower Fort Mason (also see Site Relationships below).

Site Relationships

The site relationships pertain to the larger scale of how Lower Fort Mason and the East Harbor are related spatially. Within the context of the proposed project, the site relationship between Lower Fort Mason and the East Harbor will remain virtually unchanged. Lower Fort Mason itself will not be altered, and so its relationship to the East Harbor can be maintained by keeping the major areas within the East Harbor intact. These include the water area with docks/slips and breakwaters, landscaped areas, and parking lots/driveways (automobile and boat trailers). The latter should be maintained as this paved portion of the East Harbor provides access to Lower Fort Mason's west gate.

Materials

Proposed project elements to which a materials guideline would apply include structures on land and in the water. Marine hardware, such as the mechanical boat hoist, slips, docks, and breakwater should be simple in design and reflective of the utilitarian and industrial nature of the area.

Although not designed, the visible portion of the new breakwater most likely would be concrete. It presumably would be low in the water, much like a floating dock. Concrete would be an appropriate material in keeping with the utilitarian, industrial character of the Inner Harbor.

Following precedents in the surrounding area, the restroom addition and new maintenance structure may contain a variety of unspecified building materials as long as other applicable design guidelines discussed here are followed.

Color

Paint should be applied as a solid color, without texture or mottling. Antiqued and faux finishes are inappropriate. Primary colors, especially blue, may be appropriate for marine elements such as the docks and slips. The color of the replacement boat hoist should be a muted, non-reflecting gray. In the landscaped area adjacent to the Marina Green, muted paint colors should be used on any new structures, so that they will blend with the natural surroundings.

Signage

Signs not only communicate the types of services in the area, but they are also an extremely visible part of the streetscape that adds to its overall texture. It is important that signage reinforce and respect the character of the area. Locations should be chosen not only for their proximity to the service for which they are providing information, but also take into account views to and from Lower Fort Mason. A balance should be sought between a sign's ability to be seen and inform the viewer, and the character of the cultural landscape.

Internally illuminated box signs are incompatible with the character of the area, but external illumination is acceptable, if required. The intensity of the lighting should be kept low and pointed downwards.

Architectural Character

The proposed project includes one new structure and one new addition to an existing structure in the East Harbor. The former will be a one story, 1,000 square foot maintenance building located near the existing public restrooms. This building should be utilitarian in nature with simple walls, a flat roof, and a rectangular or square floor plan. Wood siding and a hip or gable roof form are possibilities, although ease of maintenance would probably call for a more durable material for the exterior walls.

The expansion of the existing restrooms should be expressive of the existing building with its various perimeter walls and vaulted roof form. Replication of the exact materials used on the existing building is not mandatory.

Views and Vistas

Major views from Lower Fort Mason and Upper Fort Mason can be had of San Francisco Bay, Golden Gate Bridge, Marin Headlands, and the location of the proposed project. These views should be protected through the application of the guidelines above. Similarly the view of Lower Fort Mason as one approaches from the east should be protected through the application of the guidelines.

END NOTES

¹ Hoke, Amy and Eliot Foulds. *Volume One, Site History, Existing Conditions and Analysis, Cultural Landscape Report for Fort Mason, Golden Gate National Recreation Area*. (Brookline, Massachusetts: The Olmsted Center for Landscape Preservation, 2004) 82.

² Farneth, Stephen J. and Hisashi B. Sugaya, David P. Wessel, Gordon O. White. *San Francisco Port of Embrakation, Historic Structure Report*, (San Francisco: Golden Gate National Recreation Area, National Park Service, 1991) 33, 59.

³ Birnbaum, Charles. *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*, (Washington D.C.: National Park Service, 1996) 59.

⁴ Ibid, 62.

⁵ Ibid, 72.

⁶ Ibid, 84.

APPENDIX C

**MOFFATT & NICHOL ENGINEERING, SAN FRANCISCO
MARINA RENOVATION PROJECT BREAKWATER
IMPROVEMENT STUDY**

**SAN FRANCISCO MARINA RENOVATION PROJECT
BREAKWATER IMPROVEMENT STUDY
SAN FRANCISCO, CALIFORNIA**

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CONTENTS

1	INTRODUCTION.....	1
	1.1 BACKGROUND.....	1
	1.2 PROPOSED IMPROVEMENTS	2
	1.3 STUDY LIMITATIONS.....	2
2	HYDRODYNAMICS & CIRCULATION	3
	2.1 APPROACH.....	3
	2.2 RESULTS.....	3
3	WAVE PROTECTION	4
	3.1 APPROACH.....	4
	3.2 RESULTS.....	4
4	SEDIMENTATION.....	6
	4.1 APPROACH.....	6
	4.2 RESULTS.....	7
5	WATER QUALITY	9
	5.1 APPROACH.....	9
	5.2 RESULTS.....	9
6	EAST HARBOR BREAKWATER	10
	6.1 WAVE REFLECTION	10
	6.2 WAVE LOADS ON PILES	12
	6.3 IMPACTS OF BREAKWATER CONSTRUCTION	13
7	SUMMARY AND CONCLUSIONS.....	15
	7.1 SUMMARY OF FINDINGS	15

TABLES & FIGURES

TABLES

- Table 1 Design Criteria for the Floating Breakwater
Table 2 Wind Generated Wave Loads on A Typical Existing Fort Mason Pier 1 Pile

FIGURES

- Figure 1 Aerial Photo and Marina Layout for Numerical Modeling
Figure 2 Model Domain and Bathymetry for Hydrodynamic Simulation
Figure 3 Simulated Velocities During Flood and Ebb Tides – Existing Condition
Figure 4 Simulated Velocities During Flood and Ebb Tides – Proposed Condition
Figure 5 Velocity Differences Between Proposed and Existing Conditions
Figure 6 Existing Condition With NE Waves
Figure 7 Proposed Condition With NE Waves
Figure 8 Existing Condition With NW Waves
Figure 9 Proposed Condition With NW Waves
Figure 10 Normalized Wave Height Difference Between Proposed and Existing Condition
Figure 11 Model Domain and Bathymetry for Sediment Transport Study
Figure 12 Flood Conditions and West Waves (Existing Case)
Figure 13 Ebb Conditions and Northeast Waves (Existing Case)
Figure 14 Transport for Existing Conditions (Tides Only)
Figure 15 Transport for Existing Conditions (With Local Seas)
Figure 16 Transport for Existing Conditions (With Swells)
Figure 17 Transport for Breakwater Conditions (Tides Only)
Figure 18 Transport for Breakwater Conditions (With Local Seas)
Figure 19 Transport for Breakwater Conditions (With Swells)
Figure 20 Simulated Residence Times – Existing Conditions (left) and Proposed Conditions (right)
Figure 21 Conceptual Floating Breakwater
Figure 22 Wave Reflection on a Typical Pier 1 Pile
Figure 23 Location of Test Boring (left) and Soil Profile (right)
Figure 24 Typical Pier 1 Pile

1 INTRODUCTION

1.1 BACKGROUND

The San Francisco Recreation and Parks Commission proposes to renovate and rehabilitate facilities at the existing San Francisco Marina, including waterside and land side facilities. A Feasibility Study¹ for the proposed improvements was completed in 2002, which identified the extent of improvements at the marina. The marina consists of two harbors: the West Harbor and the East Harbor (also called Gashouse Cove). Both harbors have suffered damage from wave action at various times, resulting in a loss of berthing space. The proposed improvements include new wave protection structures (breakwaters) near the entrance to both harbors. Work described in this document was conducted to support the evaluation of the new breakwater segments.

Environmental review of the proposed improvements was prepared in 2003, which included results from preliminary evaluations of hydrodynamics and sedimentation for both harbors based on the following two studies:

1. A numerical modeling investigation² of waves and sand transport for the West Harbor. The purpose of this study was to investigate the effectiveness of the new breakwater segments at the West Harbor in reducing the transmission of wave energy into the basins, and to evaluate potential effects on sediment transport in the vicinity. The study included a preliminary analysis of wave exposure, and potential effects on existing sand transport patterns, before and after new breakwater construction. The emphasis was more on breakwater performance, and less on a quantitative analysis of construction impacts.
2. A preliminary engineering study including numerical modeling³ of circulation, waves, and water quality for both harbors, and discussions on breakwater design issues. The purpose of this study was to investigate the effectiveness of the proposed East Harbor breakwater in reducing the transmission of wave energy into the basin, and to evaluate potential effects of both breakwaters (both basins) on tidal circulation, sediment transport and marina water quality.

During the environmental review, concerns regarding construction impacts of building the breakwaters at both harbors emerged. The primary issue was impacts of the East Harbor breakwater on Lower Fort Mason's Pier 1. The comment was related to the potential for increased wave energy on the existing Fort Mason Pier 1 due to the wave reflection from the proposed floating breakwater, and potential effects of pile driving on the pier. Concerns regarding the impacts of both breakwaters on sediment transport patterns in the general vicinity, and the availability of both the above studies were also raised by local citizens. This document summarizes results from both the above studies, as well as additional engineering analyses to assess the impacts of East Harbor breakwater construction on Pier 1.

¹ San Francisco Marina Renovation Feasibility Study, Bureau of Engineering, Department of Public Works, December 2002, prepared by Moffatt & Nichol Engineers.

² Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000, prepared by Moffatt & Nichol Engineers

³ Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003, prepared by Moffatt & Nichol Engineers

1.2 PROPOSED IMPROVEMENTS

The existing breakwaters near the entrance to both harbors provide protection from ocean swell entering the Golden Gate and from locally generated wind-waves from the west to northwest directions. However, they do not provide protection from locally generated wind-waves from the north to northeast directions. In order to attenuate wave energy within both basins, new structures near the entrance to both harbors are proposed.

Specific marina improvements are presented in Figure 1. For the West Harbor, they include new breakwater segments at the entrance, removal of the mole at the foot of Scott Street, and shortening of the mole between Inner and Outer West Harbors. Proposed improvements for the East Harbor include a floating breakwater segment alongside Pier 1 at Fort Mason.

1.3 STUDY LIMITATIONS

The level of analysis for this investigation, and both the prior M&N studies, is commensurate with an Engineering Feasibility level of analysis. The numerical model analyses were conducted based on standard assumptions, familiarity with site-specific issues, and professional judgment. Specifically, field data related to waves, currents, and bottom bathymetry were not collected for performing calibration of the numerical models. Results of these studies can be used for preliminary design (not completed as yet), budgeting, and environmental review purposes.

The design and implementation phase should include the necessary quantitative analysis, including field data collection, structural and geotechnical engineering, numerical modeling to obtain structure geometry, monitoring needs assessment, and sediment characterization.

2 HYDRODYNAMICS & CIRCULATION

2.1 APPROACH

Hydrodynamics (water levels, flow velocities and circulation) are largely dependent on the movement of water. Tides provide the dominant forcing that drives the water, and wind waves contribute relatively less energy towards large scale advection processes. The MIKE 21 finite difference numerical model (HD module) was used to simulate hydrodynamics and tidal circulation for existing and proposed conditions. This is a two-dimensional hydrodynamic model that has been widely used in the engineering profession for similar applications, and has been accepted as an industry standard by government agencies, universities, and consultants worldwide.

Based on published navigation charts and a marina bathymetric survey conducted in 1995, a relatively large model bathymetry domain, including both the West and East Harbors and surrounding areas, was developed. The model domain and bathymetry are shown in Figure 2. The hydrodynamic model was also used to develop an advection/dispersion model to analyze flushing characteristics, and a sand transport model to analyze sedimentation processes. Model limitations typically do not allow simulations of floating or pile-supported structures, so these are incorporated into a model by adjusting bottom roughness parameters to decrease flow and to increase velocities. Therefore, Piers 1 and 2 and the proposed floating structure (shown on Figure 1) were incorporated indirectly into the model.

The tide at the Golden Gate is primarily semi-diurnal (2 highs and 2 lows for each lunar cycle), with an average tide range of 6 feet. A 14-day synthesized time series of water surface elevations was developed based on published data from the National Oceanic and Atmospheric Administration (NOAA). This boundary condition was used to drive the model. The synthesized tide was developed such that its statistics matched NOAA's published tidal datums (from Mean Higher High to Mean Lower Low). Tidal phase lags for the model boundaries in the Bay were obtained from prior hydrodynamic modeling calibrations conducted by M&N for San Francisco Bay.

2.2 RESULTS

Simulation results of circulation in the harbors are presented in Figures 3 through 5. Figures 3 and 4 show typical flood and ebb currents under the existing and proposed conditions. The results indicate that for a tidal current of about 0.7 – 1 m/s (2 – 3 ft/s) offshore of the breakwater, the current speed inside the harbors is less than 0.1 m/s (0.3 ft/s). Figure 5, which shows the change in tidal currents between existing and proposed conditions, indicates that the breakwater improvements do not result in any significant changes in the current field. A minor increase in tidal current of about 0.1 m/s is expected near the entrances of both harbors (see Figure 5). This magnitude of change is small enough that navigation related issues are not important.

The proposed breakwater conditions also show a decrease in tidal currents in certain locations. The largest decrease in velocity occurs outside the East Harbor (Figure 5). Tidal currents at this location show a small decrease (approximately 0.06 m/s). This change is considered small enough to be within the accuracy of the model and should not lead to any changes in existing sedimentation processes.

3 WAVE PROTECTION

3.1 APPROACH

The MIKE 21 Parabolic Mild Slope numerical model was used to simulate irregular wave conditions for several different direction bands, and a range of wave periods for existing conditions (without breakwater improvement) and the proposed conditions (with the breakwater improvement). Locally wind generated waves (from San Francisco Bay) as well as waves entering the Gate were analyzed. The directions and peak periods that produced the most spectral energy within the harbor were selected for the breakwater performance analysis. For locally wind generated waves from the northeast, the maximum energy was associated with a direction of 45° azimuth (“northeast”) and a peak wave period of 5 seconds. For waves through the Gate, the maximum energy was associated with a direction of 285° azimuth (“west”) and a peak wave period of 10 seconds.

The above two wave conditions for a typical high water level (MHW) were simulated. Scenarios were evaluated for each of the wave conditions for the following plan-form configurations:

- Existing Conditions (no improvements);
- Proposed Breakwaters

3.2 RESULTS

West Harbor

Figures 6 and 7 present the results of the wave study for wind-generated waves from the NE direction. A wave height of 1.65 feet from the northeast direction was used as an input to the model. Wave transmission (shown as a normalized wave height or fraction of the incident wave height) for typical conditions are shown in the figures rather than an absolute wave height. For the West Harbor, as waves propagate into the basin, the combination of wave diffraction and the shallow sand bar around the tip of the existing breakwater dissipates significant wave energy. Under existing conditions (Figure 6), the normalized wave height (ratio of the local wave height to the incident wave height) along the seawall halfway between the harbor entrance and the foot of Scott Street is approximately 50%. Thus 50% of the incident wave height reaches this location. With the proposed breakwater improvements (Figure 7), the normalized wave height is less than 20%, which indicates that the breakwater segments are effective in reducing wave transmission. Localized wave amplification near the face of the proposed structures is possible, but is expected to be very small. Adequate toe protection at the structures and, if necessary, at the base of the seawall would minimize these effects and would be included as part of the design efforts for the new breakwater segments. The amount of amplification along the length of seawall between the West and the East Harbors is not large enough (on the order of 1-2 inches, which is within model accuracy limits) to affect the integrity of the seawall structure.

The existing breakwater at the entrance to the West Harbor provides some protection from waves coming from the NW direction. A wave height of 2.3 feet from the northwest direction was used as an input to the model. Approximately 25% of the incident wave height still “leaks” into the harbor as shown on Figure 8, primarily because the waves are longer and diffract more. The proposed new breakwater segments will reduce the transmitted wave

height further, such that approximately 10% of the incident wave height would be transmitted into the harbor as shown on Figure 9.

East Harbor

For the East Harbor, modeling results show that the existing harbor is very exposed to northeast waves (see Figure 6). Up to 100% of the incident wave heights are transmitted into parts of the harbor. The proposed breakwater alignment is very effective in protecting against local seas coming from the northeast. Figure 7 shows that the transmission can be reduced to about 50% of the incident wave height by an approximately 450-foot long floating structure in a north-south direction. More attenuation is possible, but reflection of wave energy towards Pier 1 would be higher.

Very little of the wave energy from the NW direction leaks into the East Harbor because of the existing breakwater (see Figure 8). This same result can be expected under the proposed conditions even though Figure 9 shows a slight increase in transmitted wave energy at this location. The apparent increase is due to the model limitations described in Section 2. In reality, the longer period swells would pass through the floating breakwater unaffected, while shorter period wind waves would have small, localized reflection effects.

A summary of the wave analysis is also presented in Figure 10, as maps of net change in wave heights between existing and proposed conditions. The effectiveness of the proposed breakwater segments for wind-generated northeast waves, which is the primary objective of the structures, is clearly visible.

4 SEDIMENTATION

4.1 APPROACH

Sand transport modeling, coupled with tidal hydrodynamics and wave propagation, was conducted for the West Harbor. The study area for the modeling effort is shown on Figure 11. Results of this sand transport modeling are applicable to the West Harbor only, because sediment processes at the East Harbor are dominated more by silt and clay which was not simulated. Simulation of cohesive sediment (silt and clay) transport requires a set of different numerical models that are specifically designed for cohesive sediment and extra modeling effort. Simulated tidal current, which plays a dominant role in cohesive sediment transport, was used to analyze the change of sedimentation patterns in the East Harbor.

For the West Harbor, simulations were conducted using output from the wave models described in Section 3. For strong flood and ebb conditions, the wave field was coupled with tides to evaluate wave-current interaction. Simulations were conducted for the 2 configurations (Existing and Proposed configurations) for each of the following conditions. A total of six cases were thus simulated.

- Average Tide Only (no waves);
- Average Tide + Local Seas;
- Average Tide + Swells from Gate.

The sedimentation model uses output from the hydrodynamic model (water surface elevation, depth-averaged velocities, and energy flux) which results in motion of sediments. Results of the hydrodynamic modeling were used to estimate sediment transport patterns for the different plan-form configurations and wave conditions. A sediment grain-size of 0.1 to 0.15 mm, a significant wave height of 1.6 feet from the northeast, and a significant wave height of 2.3 feet from the west was used in the modeling. Data on grain-sizes was obtained from prior literature and dredging records. The wave heights used were associated with predominant conditions, which would persist most of the time, rather than extreme storm waves, which occur very rarely and were not considered representative for the analysis of long term sediment transport pattern. However, the purpose of the sediment transport modeling is to identify differences between different plan-form configurations, rather than the absolute transport values. Simulations of extreme storm conditions are not necessary.

A discussion of results is presented below. It should be noted that the sedimentation analysis was completed without calibration since no field data collection was performed. Also a single wave height from each direction was simulated, rather than an integration of different wave heights as occurs in reality. The emphasis of the modeling effort was on transport patterns rather than a quantitative analysis of rates of sedimentation. An accurate assessment of sedimentation rates would involve sediment sampling, measurements of waves and tidal currents at several locations around the harbor, and integration of storm events which result in substantial movement of sand. The approach, however, is appropriate for preliminary design and environmental review purposes.

4.2 RESULTS

West Harbor

Figure 12 presents the flow-field for a flood tide coupled with swells from the Gate for existing conditions. Figure 13 presents the flow-fields and current speeds for an ebb tide coupled with local seas from the northeast for the existing conditions.

Sediment transport patterns over one complete tide cycle, for different boundary conditions, are presented on Figures 14 through 16. The colors represent potential for bed change in meters/day; red colors represent accretion and blue colors represent erosion. The vectors indicate net transport direction over a tide cycle. The results indicate deposition off the tip of the breakwater for all cases. The average tide by itself does not result in significant transport along the Outer West breakwater (see Figure 14). Locally generated wind waves result in potential for deposition along the north edge of the breakwater and transport around the tip, towards the harbor. A potential for deposition also exists along the Marina Green seawall, farther south. Under swell conditions only, the potential for transport around the tip is not significant; deposition does occur along the north edge of the breakwater. We speculate that under combined sea and swell conditions, which occur most of the time, sediment is transported towards the breakwater from sources farther west and deposition occurs near the tip. The accumulation along the north edge of the breakwater has probably reached a state of equilibrium, resulting in additional transport around the tip in recent times.

Sediment transport patterns for the proposed conditions are presented in Figures 17 through 19. No appreciable changes from existing conditions are observed in the West Harbor. Some deposition is expected immediately adjacent to the entrance, at the tips of the breakwater segments. The small increase in velocity in the lee of the breakwater, near the tip, may result in a lower rate of deposition.

The combination of waves and tidal currents results in net littoral transport of sand from the west to the east. In recent monitoring studies⁴, the net average longshore sand transport rate at Crissy Field was estimated to be about 25,000 cubic yards per year towards the east. A portion of these transported sand deposits around the tip of the West Harbor breakwater, and the balance goes back out to deeper water due to the orientation of the existing breakwater. The proposed improvements, which are all down coast of Crissy Field, will not affect the existing littoral sand transport system in the area between the Golden Gate and the West Harbor. Effects will be limited to the immediate vicinity of the proposed breakwater segments, where localized deposition/erosion effects may occur. As shown in Figures 5 and 10, it is anticipated that the small increase in velocity through the narrower marina entrance combined with the small increase in wave energy in front of the proposed breakwater segments, and the significant decrease in wave energy in the lee (sheltered side) may result in less sedimentation in front of the breakwater and more in the lee. However, the average annual deposition rate in the vicinity of the entrance is not expected to change. Periodic dredging along the north side of the existing breakwater will most likely reduce the potential for sedimentation inside the harbor.

Under existing conditions, reversals of transport (sand moving to the west) probably occur during local northeast storms. The proposed breakwater segments will not contribute to additional sand moving westwards under these conditions.

⁴ An Evaluation of Morphological Changes at the Crissy Field Tidal Marsh Inlet and East Beach, October 2001, prepared by Philip Williams & Associates for the Golden Gate National Parks Assoc.

East Harbor

Sedimentation in the East Harbor between 1995 and 1998 has been estimated to be about 1 foot, based on condition surveys. Unlike the West Harbor, the East Harbor experiences fine suspended sediment deposition rather than sand. Tidal currents play a dominant role in the deposition and erosion of suspended sediment. Given the minimal change in tidal currents in this harbor due to the proposed improvements (see Figure 5), there will no change in the sedimentation rate either within or in the vicinity of the East Harbor.

5 WATER QUALITY

5.1 APPROACH

Concerns regarding the potential water quality effects of the breakwater improvements were addressed by conducting a flushing study of both harbors. The hydrodynamic model was used to evaluate residence times for the harbors for existing and proposed conditions. A long residence time can potentially lead to water quality issues especially if storm effluent (or combined sewer effluent) discharges into the harbors.

In this study the residence time is defined as the time it takes to flush a conserved, well-mixed constituent out of the marina. Traditional methods of residence time calculation, such as tidal prism method, assume instant mixing for the entire marina, and therefore the results will be an idealized average residence time. However this calculation is dependent on the shape of the water basin, because it is known that the residence time at the most distant corner from the entrance is usually much longer than that near the entrance.

5.2 RESULTS

West Harbor

The flushing analysis is presented in Figure 20. Existing conditions are shown on the left panel and proposed conditions are shown on the right panel in this figure. The analysis shows that near the entrance to the West Harbor, the new breakwater segments do not affect the residence time (remains at less than 1 day). Within the inner harbor, the proposed removal of the mole improves (albeit slightly) the flushing of the basin. Under the proposed conditions the area in the inner harbor with a residence time of about 4.8 days (red area in Figure 20) is reduced in size when compared to the existing conditions.

East Harbor

No changes are observed in the East Harbor due to the new floating breakwater segment. This is as expected because a floating breakwater does little to change the tidal flow. It acts primarily to reduce short period wave energy.

In general, model results show very little difference between residence times under the existing and proposed conditions. Thus, water quality for the proposed scenario should not differ from existing water quality. In the West Harbor this can be attributed to the sufficient opening in the new breakwaters combined with eliminating and shortening the mole structures. The alignment and lengths of the new breakwaters allows flushing similar to existing conditions. In the East Harbor, residence time will not change under the proposed conditions because the floating breakwater has little to no impact on the large-scale advection of water passing underneath it.

6 EAST HARBOR BREAKWATER

6.1 WAVE REFLECTION

The proposed floating breakwater in the East Harbor is located near valuable historic landmarks and sensitive shorelines. A preliminary analysis of potential impacts of the proposed breakwater on Pier 1 at Fort Mason is provided in this section. In particular, the potential for wave reflection from the breakwater to the piles supporting the pier are investigated. Selection of the proposed breakwater type and basic parameters, as well as a consideration of construction techniques to minimize potential effects on the pier, is also described.

Waves arriving at the East Harbor are primarily from two sources: ocean swell and local wind wave. Ocean swells are low frequency (long period) ocean waves that propagate through the Golden Gate from a direction of 285° true north. Since typical floating breakwaters are only effective for short period waves, long period ocean swells propagate through the structure relatively unchanged (with little energy dissipation). For short period wind waves, wave energy will be partially transmitted, partially reflected and partially dissipated. The percentage of transmitted, reflected and dissipated wave energy will largely depend on the local water depth, incident wave characteristics, and breakwater type and parameters. Each of these parameters is described below.

1. *Local Water Depth*

Water depth at the project site (East Harbor at Pier 1) varies due to tides, which can be characterized as semi-diurnal (two highs and two lows every day). The diurnal tidal range (elevation difference between the average of recorded higher highs and lower lows) is approximately 5.8 feet in the project vicinity. Based on available bathymetric survey data for the East Harbor, water depths along Pier 1 range from 10 feet below MLLW near the seawall to 25 feet below MLLW at the north end of the pier. A maximum water depth of 25 ft below MLLW was used to calculate wave reflections from the floating breakwater.

2. *Wind Wave Conditions*

Wind generated wave conditions were estimated based on spectral wave hindcasting techniques, as described in the Shore Protection Manual (US Army Corps of Engineers, 1984). The input parameters are adjusted wind speed (wind stress factors) and the associated wind duration, fetch distance and average water depth along the fetch. The fetch distance, defined as the length of water body (aligned parallel to wind direction) over which the wind generates waves, is measured from the NOAA navigation chart. A fastest mile wind speed of 55 miles per hour, which represents greater than a 25-year return period, was used to calculate the extreme wind wave based on data from NAS Alameda. The significant wave height was estimated to be 3.5 feet, with a peak wave period of 4 seconds, and these were used as design wave conditions. The primary wind wave direction was assumed to be northeast, with a fetch length of 9 miles in this direction. Wind waves coming from other directions are less severe due to the sheltering effect of Angel Island, Alcatraz Island, and Treasure Island.

3. Breakwater Type and Parameters

The type of breakwater is one of the most important issue for the East Harbor. A typical pile-supported floating breakwater, as shown in Figure 21, is deemed to be practical at this location. This breakwater consists of a rectangular float, with an extended porous wall. The rationale for selecting a floating-type structure is to minimize the reflections onto the nearby Pier 1. Rubble mound breakwaters require a large footprint, and sheetpile breakwaters could have significant wave reflections which could result in larger wave heights, and a higher potential for scour at the base of pier pilings at Pier 1.

As stated earlier, water depths along Pier 1 range from 10 feet to 25 feet at low tides (15 to 30 feet at high tides), with localized scour near the base of piles. A floating breakwater is not expected to alter there water depths, or cause significant scour at the base of the Pier 1 piles. Some scour at the base of the guide piles is expected, but the effects will be localized (within 2-3 pile diameters, or less than 5 feet). A floating breakwater, which would achieve the following performance parameters for the design wave conditions, was selected for this study:

$$C_t = 0.5 \text{ max (transmission coefficient, defined as the ratio of the transmitted wave height to the incident wave height)}$$

$$C_r = 0.6 \text{ max (reflection coefficient, defined as the ratio of the reflected wave height to the incident wave height)}$$

These parameters are related by the following formula:

$$C_t^2 + C_r^2 + E_{dis} = 1,$$

where, $E_{dis} = 0.4$ is wave energy dissipation rate for the floating breakwater.

Wave transmission through the proposed floating breakwater can be estimated using the following formulation⁵:

$$C_t = \frac{1}{\sqrt{1 + \left[\frac{pb \sinh\left(\frac{2pd}{L_i}\right)}{L_i \cosh\left[\frac{2p(d-h)}{L_i}\right]} \right]^2}},$$

where,

L_i is the incident wave length;

b is the width of the floating breakwater;

h is the draft of the floating breakwater;

d is the local water depth.

Given the breakwater geometry (Figure 21), a maximum transmission coefficient of 0.5 ($C_t = 0.5$) and a maximum reflection coefficient of 0.6 ($C_r = 0.6$) are very easily achieved by

⁵ Floating Breakwaters: State-Of-The-Art Literature Review, L. Z. Hales, U.S. Army Engineer Waterways Experiment Station, Vicksburg, Mississippi. Technical Report No. 81-1, October 1981.

varying variables b , D , h and the number and size of holes on the porous wall. This assumes that a 40% dissipation rate ($E_{dis} = 0.4$) can be achieved. Wave reflections due to porous-walled breakwaters were investigated in the laboratory by Richey and Sollitt in 1969⁶. The laboratory studies indicate that a 40% dissipation rate (E_{dis}) is easily achievable, and in most cases a higher dissipation will be achieved which will reduce the reflection and transmission even further.

Design criteria for the floating breakwater (wave reflection and transmission coefficients) are summarized in Table 1.

Table 1 Design Criteria for the Floating Breakwater

Design Wave Period (second)	Design Wave Height, H_s (feet)	Transmission Coefficient, C_t	Reflection Coefficient, C_r	Dissipation Rate, E_{dis}
4	3.5	0.5 max	0.6 max	0.4 min

The calculations demonstrate that the floating breakwater will not function very well for ocean swells with periods greater than 10 seconds. It is, however, effective in attenuating high frequency wind waves with periods of 4 seconds or less. This is expected because a floating breakwater is typically designed for short period (high frequency) wave conditions (3-4 seconds). The proposed floating breakwater would be designed to meet these criteria over the entire length of the breakwater regardless of water depth.

6.2 WAVE LOADS ON PILES

Wind-wave induced loads on a typical Pier 1 pile for existing as well as proposed (with floating breakwater) were estimated using the stream function wave theory and standard methods described in the Shore Protection Manual. A pile diameter of 4 feet was used in the analysis. A conceptual plan showing the floating breakwater, a typical Pier 1 pile and direction of incident and reflected wind waves is presented in Figure 22.

1. Wave Loads For Existing Conditions

Wave loads on a typical Pier 1 pile for existing conditions are dependent on the incident wave characteristics (assuming no reflections off the seawall). Using a significant wave height of 3.5 feet (>25 yr return period), peak wave period of 4 seconds, water depth of 28 feet, and a pile diameter of 4 feet, the wind wave induced loads on a typical Pier 1 pile is estimated at 2.5 kips (integrated from mudline to wave crest). The corresponding moment about the mudline is 44.5 kip-feet.

2. Wave Loads with Floating Breakwater

Wave loads on a typical Pier 1 pile, with the floating breakwater in place, is dependent upon the incident and the reflected waves. The resultant wave height that impinges on a typical pile can be estimated by combining the incident and reflected waves. The reflected wave height could be up to 60% of the incident wave height (Table 1), which would be 2.1 feet. For a typical northeast wind wave, the resultant wave height (H_{tot}) could be 4.1 feet if unaffected by Piers 1 and 2. The corresponding integrated wave force and moment (about the mudline) on the same pile will be 2.7 kips and 49.5 kip-feet.

⁶ *Ibid*

In reality, these numbers would be less because the piles under Piers 1 and 2 would reduce wave heights from this direction. As a conservative assumption, and to estimate an upper bound, wave heights from this direction were not reduced. These results are summarized in Table 2.

Table 2 Wind Generated Wave Loads on A Typical Existing Fort Mason Pier 1 Pile

	Existing Conditions	w/ Floating Breakwater	
		NE Wave	Percent Increase
Wave Height	3.5 feet	4.1 feet	17%
Total Force	2.5 kips	2.7 kips	8%
Moment about mudline	44.5 kip-feet	49.5 kip-feet	11%

These results should be considered conservative, because they are based on the maximum of the design criteria shown on Table 1. The actual breakwater design would allow more energy dissipation and less energy reflection, thus further reducing the total resultant wave loads on Pier 1 piles. To assess the effects of these changes, wave loads were compared to the structural capacity of the piles as described below.

6.2.1 INCREASED WAVE LOADS VS. EXISTING PIER 1 PILE CAPACITY

An earlier structural evaluation for the Fort Mason Campus Pier 1 in 1999⁷ showed that the maximum allowable bending moment for the 4-foot diameter pile was 230 kip-feet. This capacity factored in the structural deterioration of the pier over time. In comparison, the maximum bending moment caused by the resultant wind waves (incident + reflected) is 49.5 kip-feet. This number is much less than the existing pile capacity (230 kip-feet), which indicates that there should not be any additional breakwater induced wave damage to the existing piles under Pier 1. The structural capacity of the Pier and the piles themselves are not governed by wave-induced effects, which are a relatively small component of the forces that the Pier was designed to sustain.

6.3 IMPACTS OF BREAKWATER CONSTRUCTION

6.3.1 EXISTING SOIL AND PIER STRUCTURE CONDITIONS

Construction of the proposed breakwater will involve driving guide piles in the seafloor to anchor the floating structure. Knowledge of the seafloor soil strata is important for determining the type of pile and construction methods to be used. Existing soil conditions have been investigated by Harding Lawson Associates (HLA) in 1986⁸ and by the U.S. Army Corps of Engineers (USACE) in 1950. Three test borings were drilled in 1986 by HLA, and one in 1950 by the USACE. The locations of these test borings and a profile of the sub-bottom soil layers along the pier are provided in Figure 23.

Based on available information, the existing sub-surface strata (from upper to lower) can be characterized as 12~59 feet of soft-to-medium-stiff silty clay (bay mud) depending on distance from shoreline, underlain by 0~50 feet of very dense silty and clayey sand, and 10~30 feet of very stiff old bay mud and bed rock below that. The existing Pier 1 is

⁷ Fort Mason Campus Survey, Piers 1, 2 and 3 Structural Evaluation, Moffatt & Nichol Engineers, M&N File No. 4326-01, June 18, 1999.

⁸ Soil Investigation and Seismic Design Criteria, Pier 1, Fort Mason, San Francisco, California, Harding Lawson Associates, HLA Job No. 9010,026.04, May1, 1986.

supported by large concrete caissons and timber piles that penetrate the soft bay mud and rest on the very dense and stiff sub-layers (Figure 24).

6.3.2 NEW PILE DRIVING FOR THE PROPOSED FLOATING BREAKWATER

Soil liquefaction and vibration are two primary causes of structure damage due to pile driving. The proposed guide piles would go through the upper bay mud without much driving. The dense silty sand and stiff old bay mud below eliminates the potential for liquefaction from the proposed pile driving. Repairs to the existing Piers 1 and 2 at Fort Mason have included pile driving through the deck of the piers, very close to the existing piles, without any significant effects on the structure.

The geotechnical investigation and pile design analysis, which will be needed for the design phase, should investigate potential pile types and driving effects. Soil vibration can be greatly reduced by pre-drilling or water jetting, or utilizing open steel piles rather than concrete. A test pile program which would include measurement of underwater acoustics and structure vibrations could be set up if the geotechnical investigation warrants it. Some of the potential measures which can significantly reduce pile driving vibrations at Pier 1 are:

- water jetting to assist driving
- non-displacement type steel piles and vibratory driver

6.3.3 OTHER CONSTRUCTION CONSIDERATIONS

Appropriate measures should be taken during the construction of the proposed breakwater segments to avoid re-suspension of sediments. These measures are usually well defined in the Army Corps and Regional Water Board permits, and will include Best Management Practices to limit turbidity and re-suspension. Construction related sediment erosion and transport to Crissy Field and East Beach would be an issue only under storm wave conditions, and adequate precautions should be taken by the construction contractor to limit the amount of open excavation that may result in scour or erosion. The construction of the floating breakwater at the East Harbor can be easily phased to allow for repairs to Pier 1, if simultaneous construction activities are envisioned. Even if the breakwater is installed prior to Pier 1 repairs, a guide pile-float system allows for easy disconnection of the float from the piles. Thus the breakwater itself will not be a constraint during repairs to Pier 1. The guide piles themselves will not impede construction access because of their spacing (over 20 feet between piles).

7 SUMMARY AND CONCLUSIONS

7.1 SUMMARY OF FINDINGS

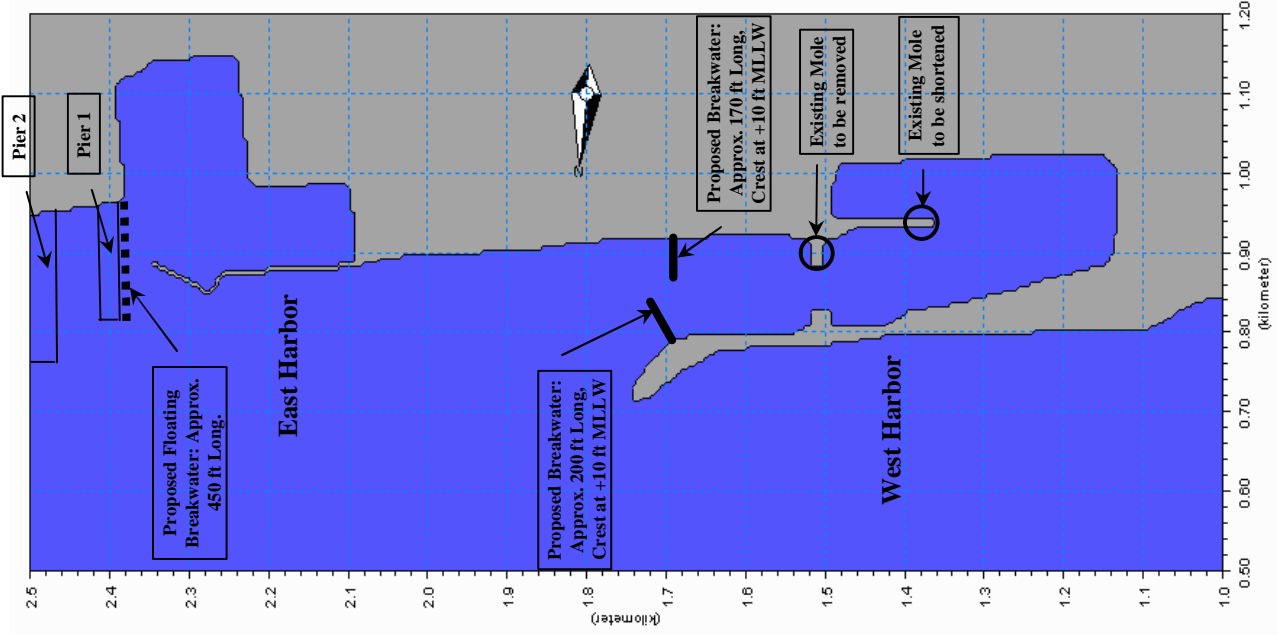
A widely used and accepted numerical simulation model was applied to assess circulation, wave dynamics, sedimentation and water quality of the San Francisco Marina for existing and proposed conditions. Circulation under proposed conditions will not differ considerably from existing conditions. Changes in flow velocities at the mouth of the harbor entrances (where increased velocity occurs) and outside the harbor entrances (where decreased velocity occurs) are small, less than 0.1 m/s at all locations. Changes in current speeds of this magnitude are not significant enough to affect circulation or navigation.

The proposed breakwater segments are very effective in reducing wave transmission into the basins. Significant reductions in wave height are seen in the West Harbor under proposed conditions, and even larger reductions, up to 50%, are seen in the East Harbor.

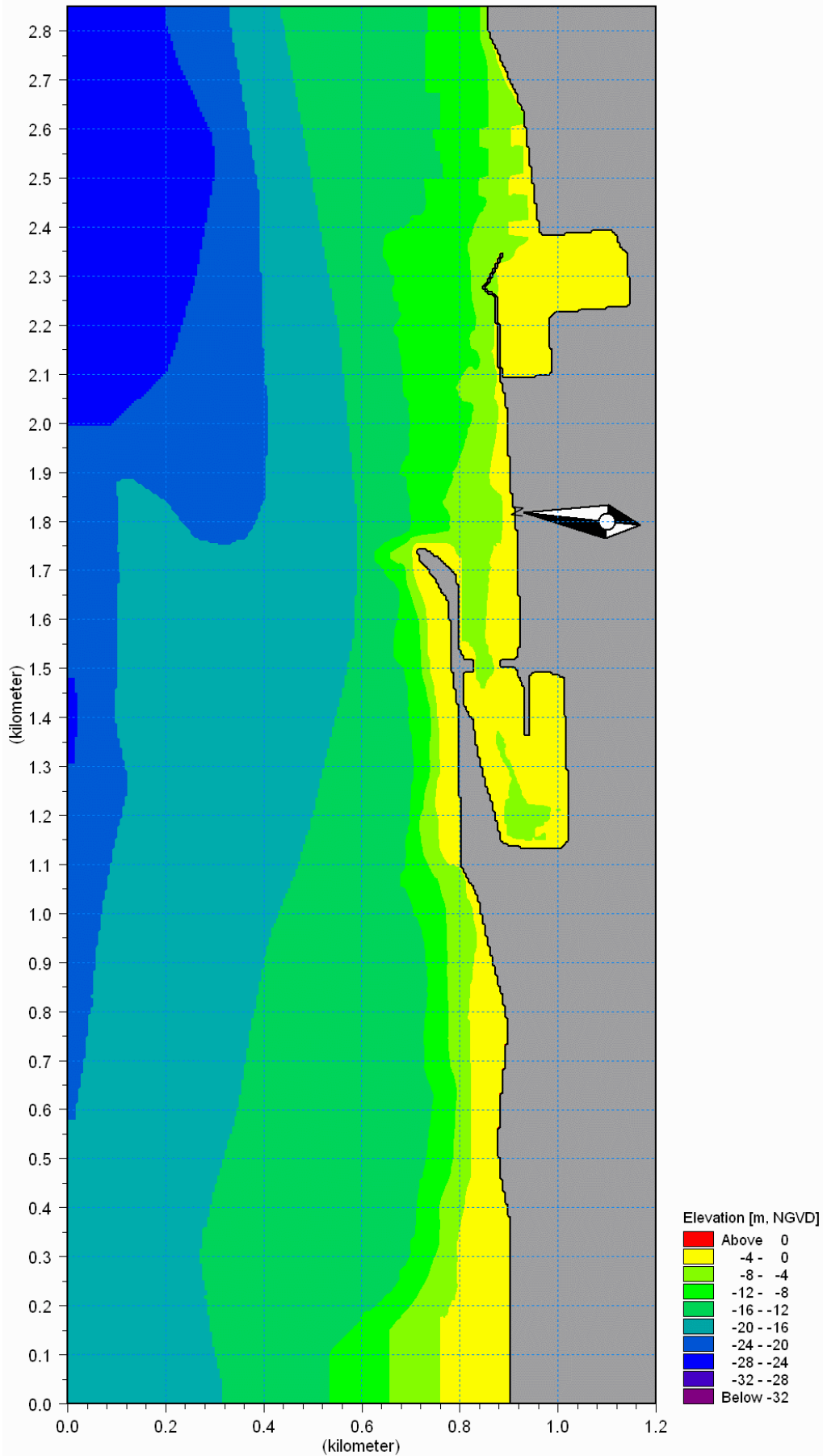
Model results of sediment transport show a net transport of sand from the west to the east due to the combination of waves and tidal currents. A portion of this transported sand deposits around the tip of the West Harbor breakwater, while the remainder is advected to deeper water due to the orientation of the existing breakwater. The proposed improvements will not affect the transport west of the project site. Effects will be limited to the immediate vicinity of the proposed breakwater segments, where localized deposition/erosion effects may occur. It is anticipated that the small increase in velocity through the narrower marina entrance combined with the small increase in wave energy in front of the proposed breakwater segments, and the significant decrease in wave energy in the lee (sheltered side) may result in less sedimentation in front of the breakwater and more in the lee. However, the average annual deposition rate in the vicinity of the entrance is not expected to change.

The flushing characteristics of the harbors, which is an indicator of water quality, will not be affected by the proposed breakwater improvements. In the West Harbor, the opening in the new breakwaters combined with eliminating and shortening the mole structures allows sufficient flushing. In the East Harbor, residence time and subsequent water quality will not change under the proposed conditions because the floating breakwater has little to no impact on mass transport of water.

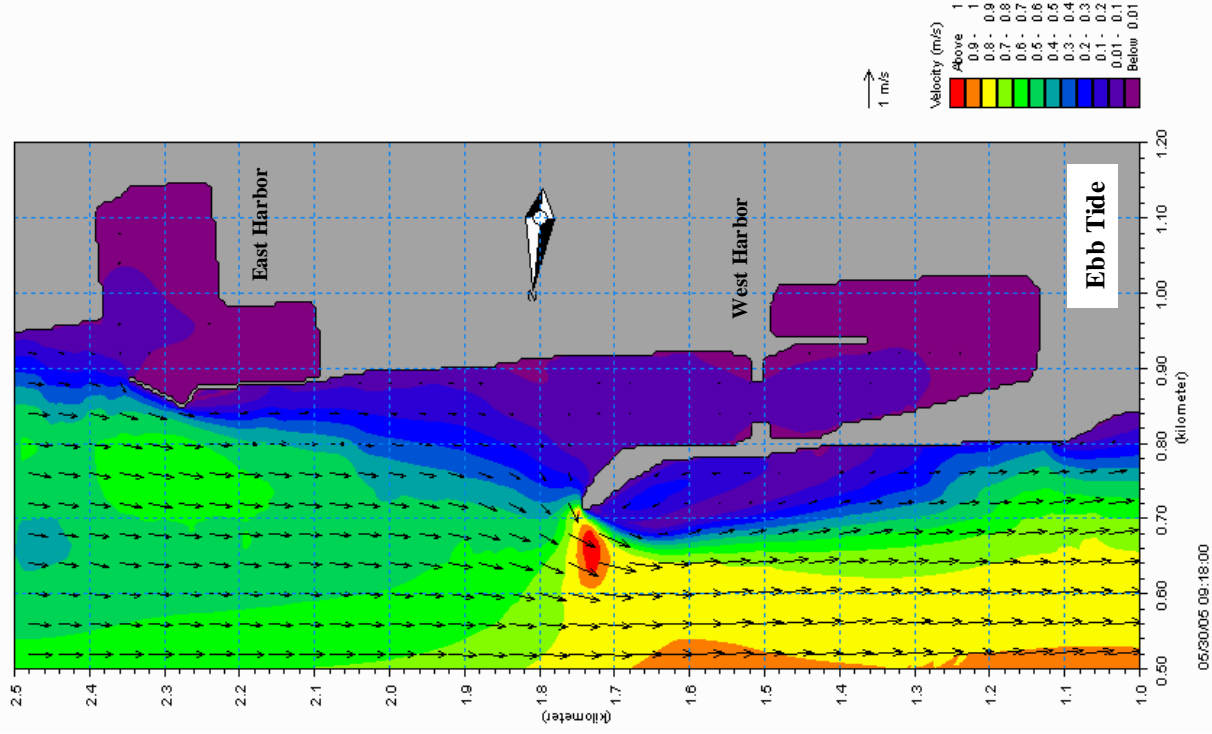
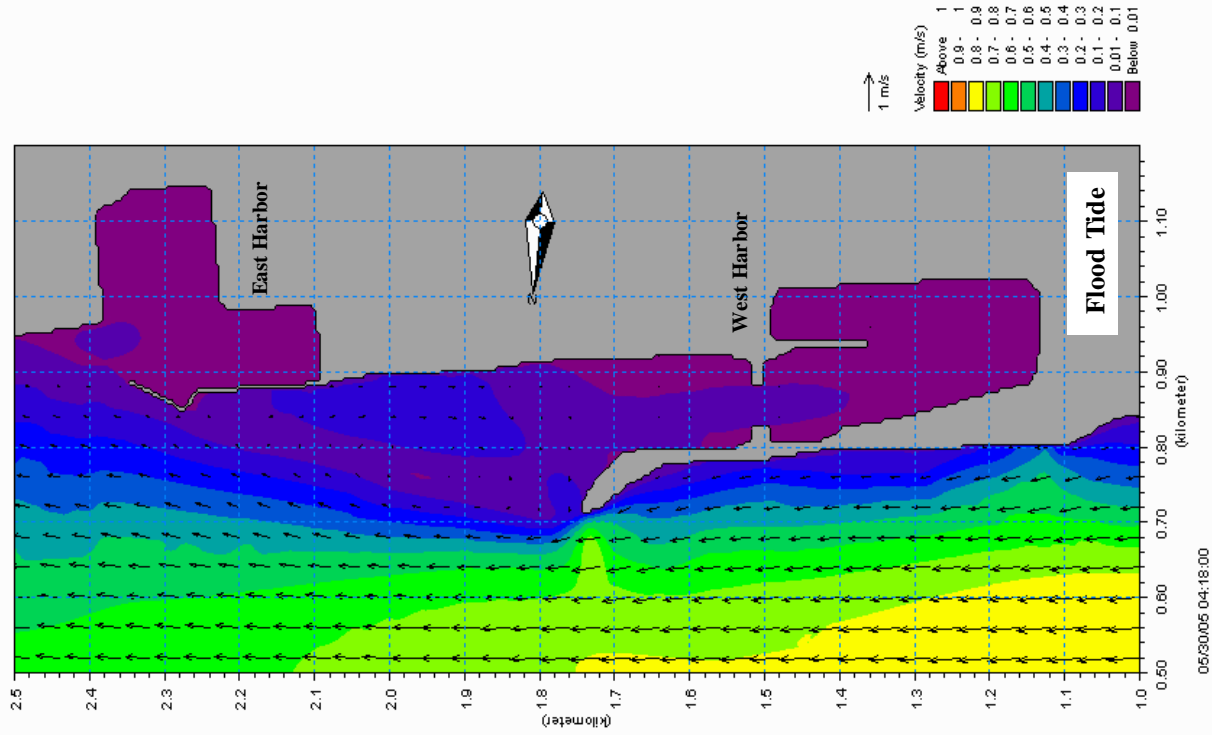
Special consideration was given to the breakwater design in the East Harbor because of its proximity to, and perceived impacts on, the Historical Landmark District at Fort Mason. A floating breakwater was selected because its design can be tailored to minimize effects to nearby structures and shoreline. The floating-type breakwater was shown to be effective in reducing transmission of short period waves. The increases in wave loads on Pier 1 piles due to reflections from the proposed breakwater are well below the existing structural capacity of the structure. Additional investigation during the detailed design phase of the breakwater can result in further lowering wave reflections and wave loads. Finally, construction-related vibration impacts on Fort Mason's Pier 1 can be minimized by using water jetting techniques, non-displacement type steel piles and vibratory driver as opposed to solid concrete piles and impact hammer.



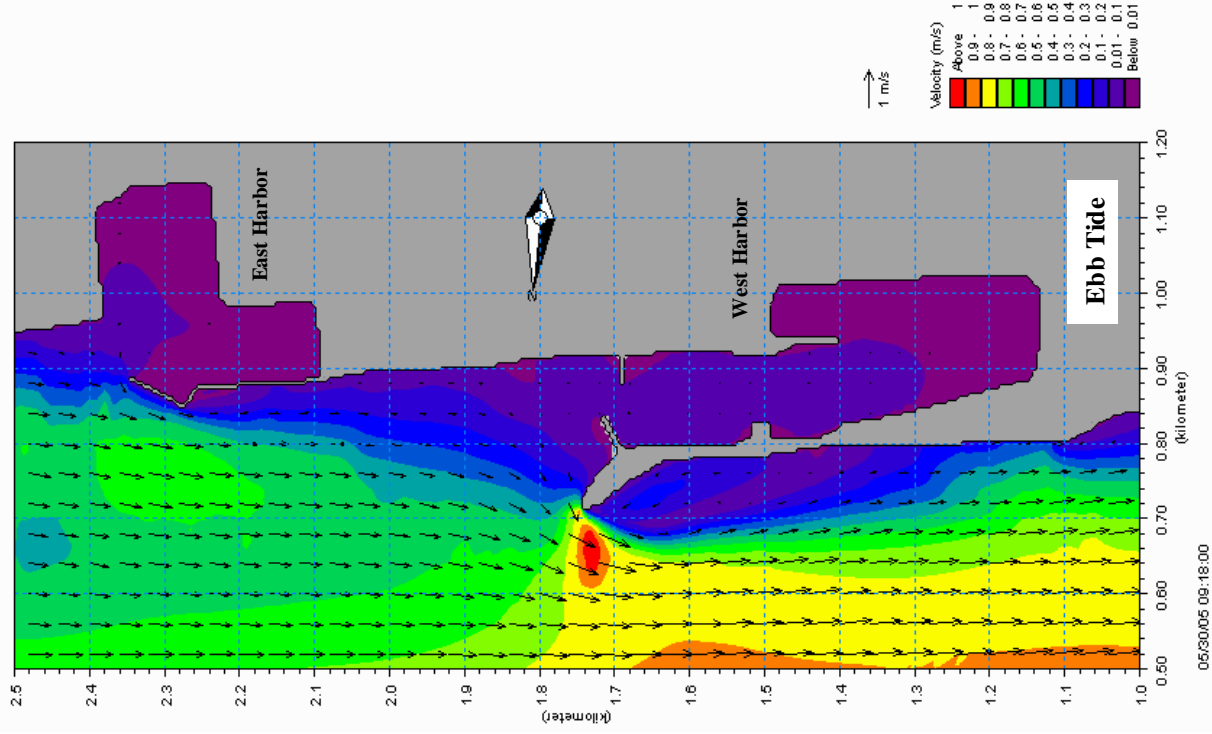
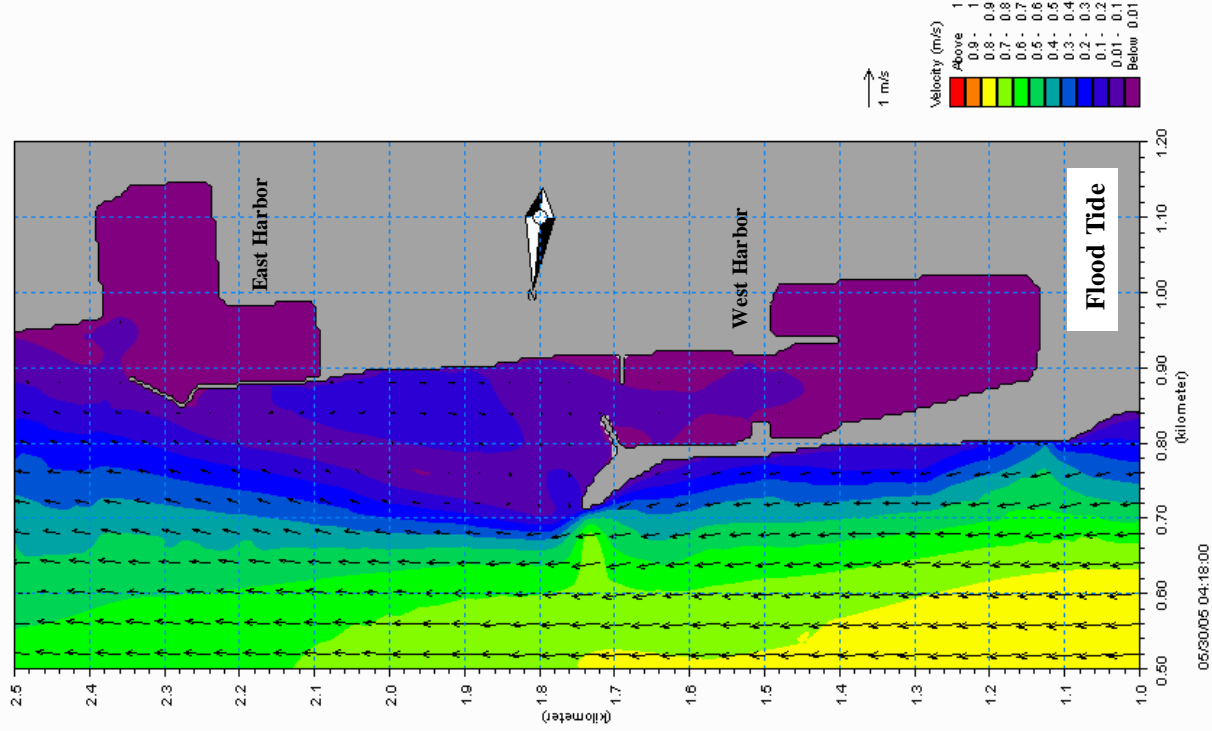
Aerial Photo (left) and Marina Layout for Numerical Modeling (right)
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



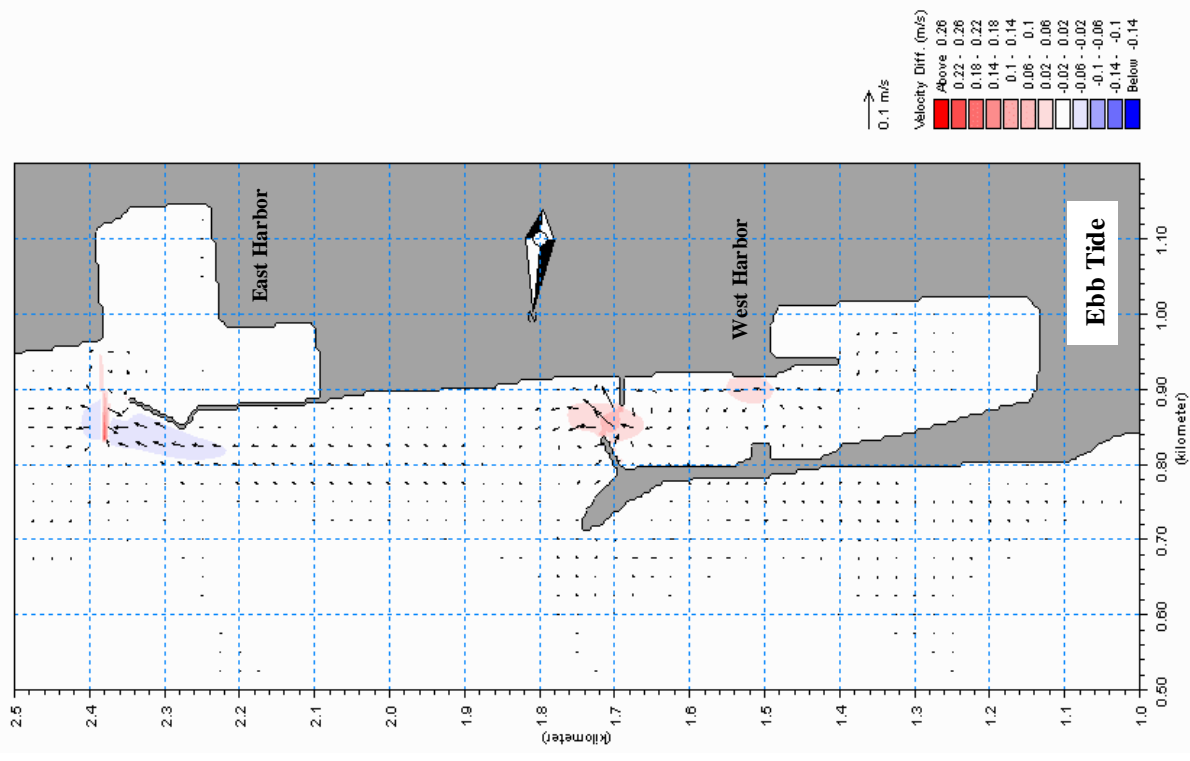
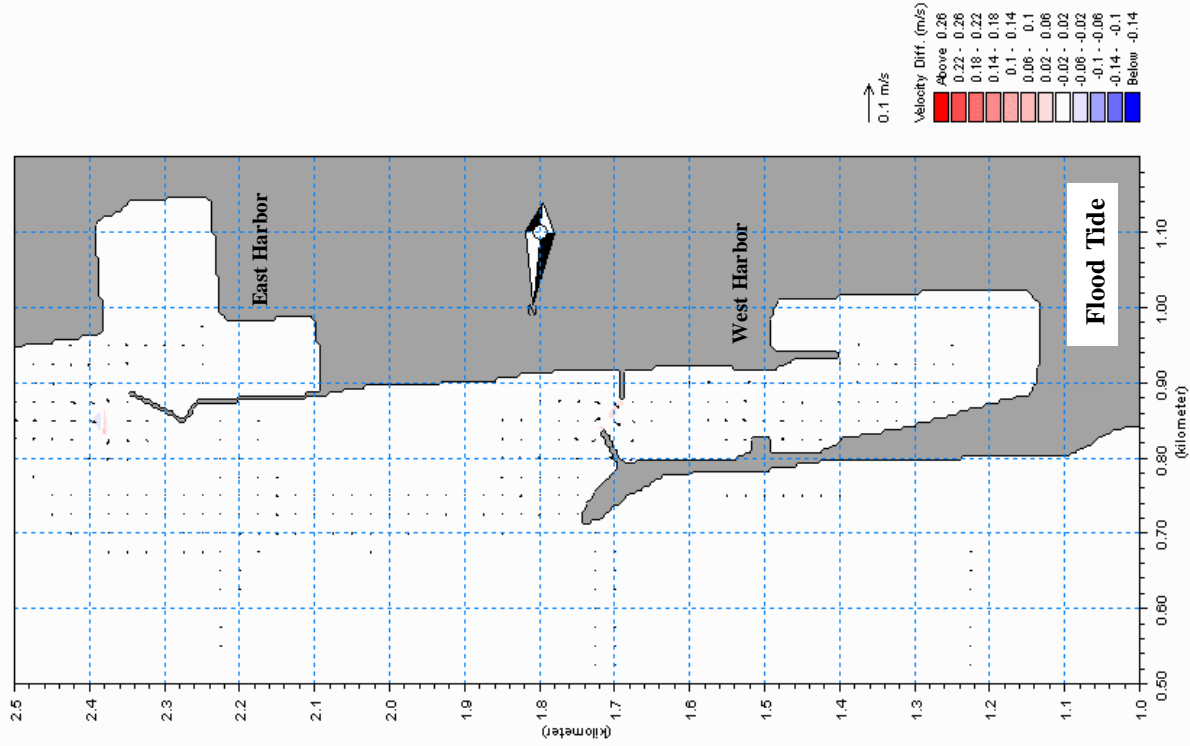
Model Domain & Bathymetry for Hydrodynamic Simulation



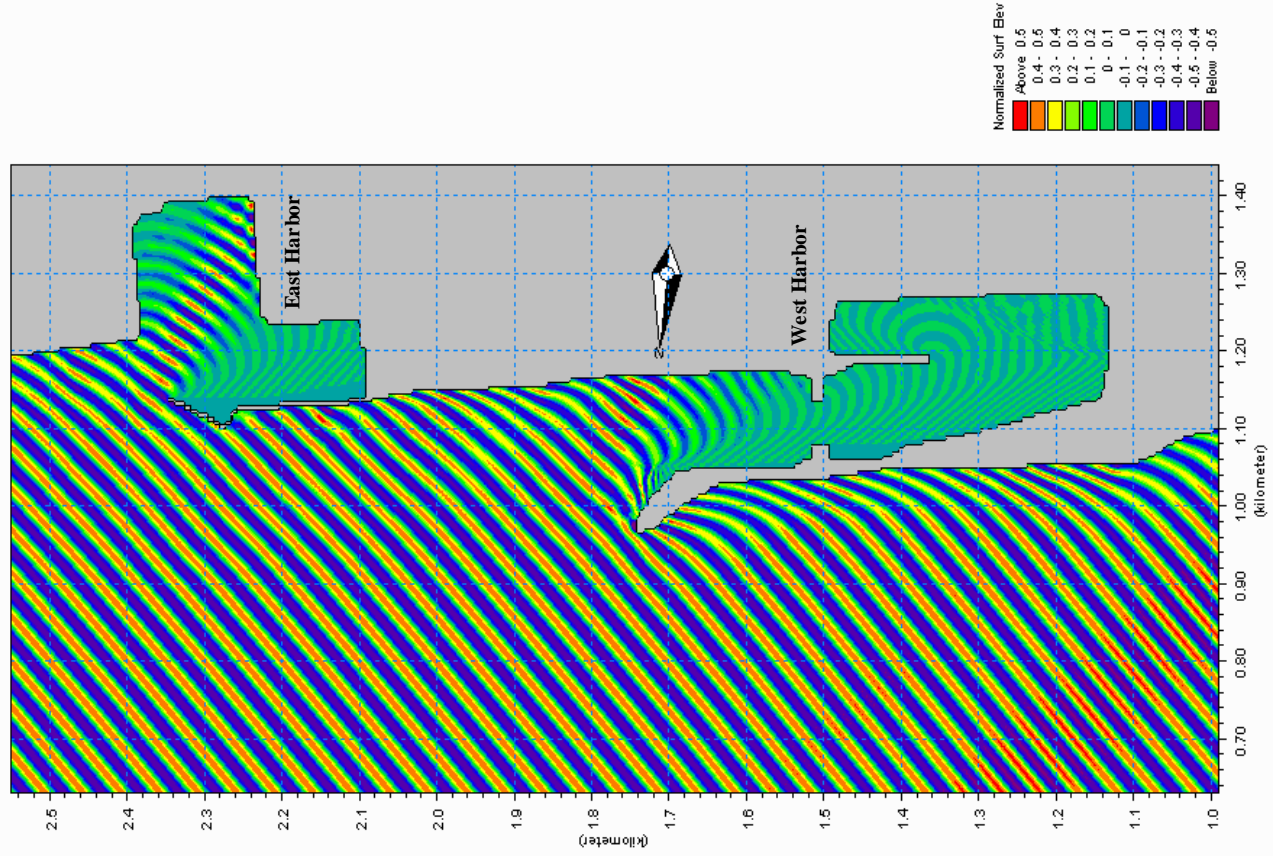
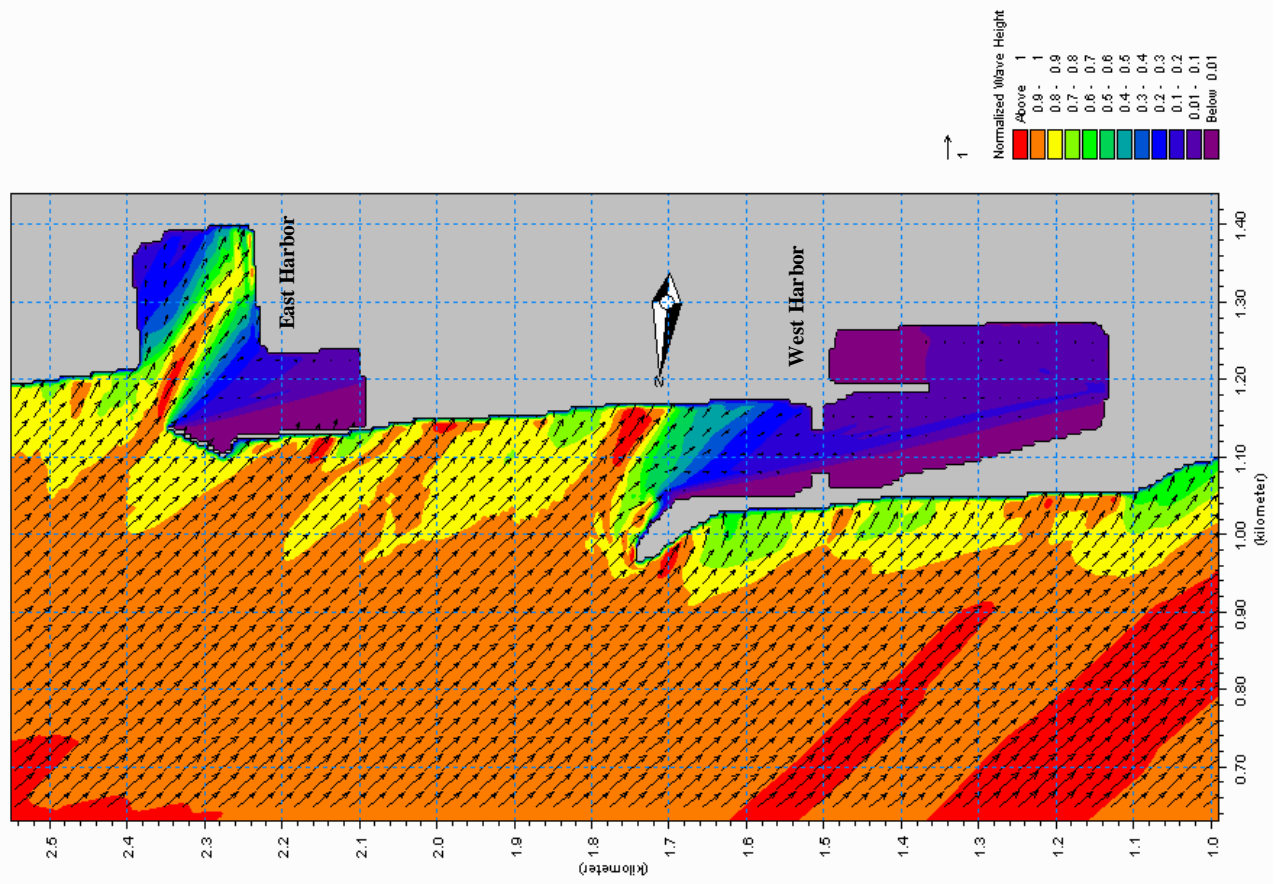
Simulated Velocities – Existing Condition
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



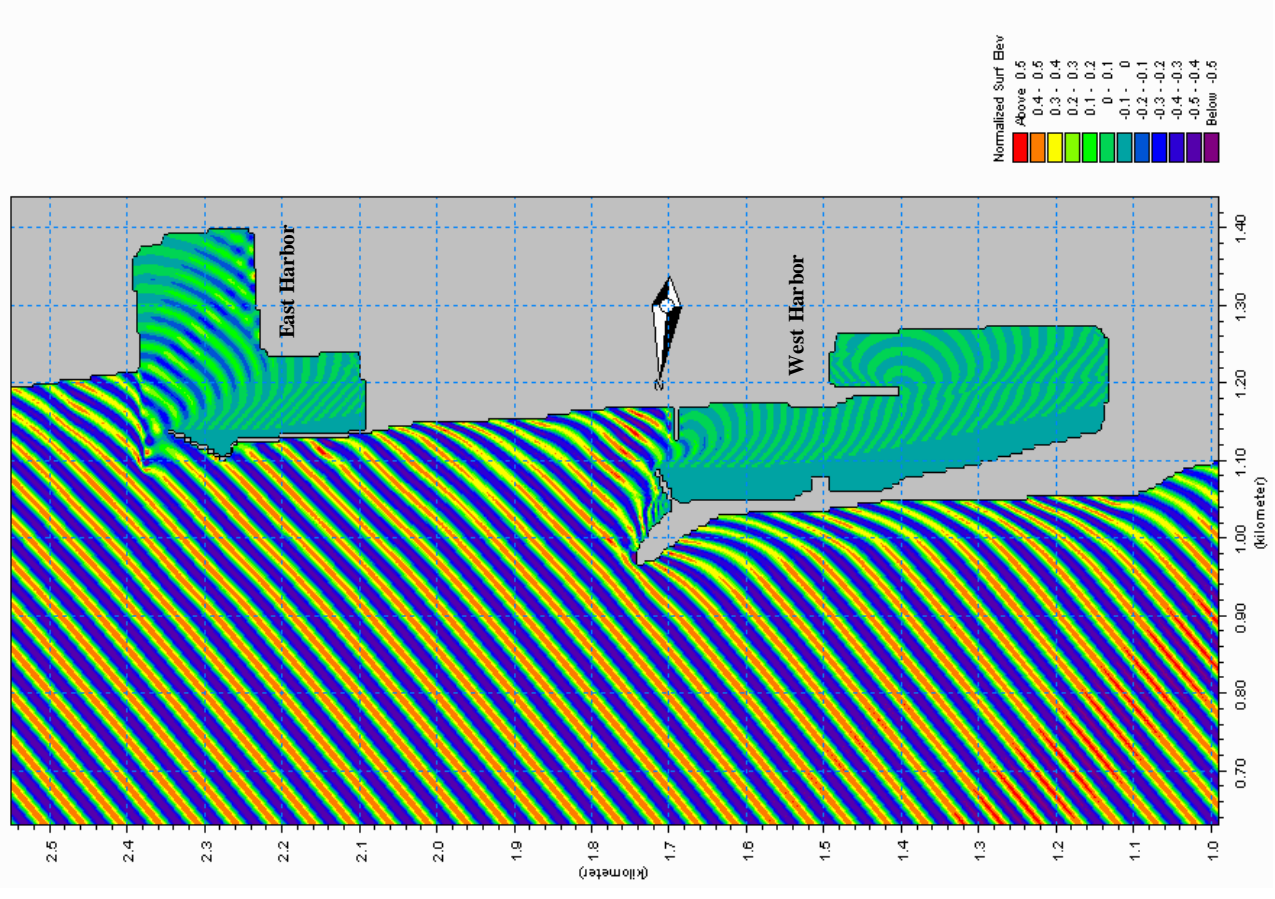
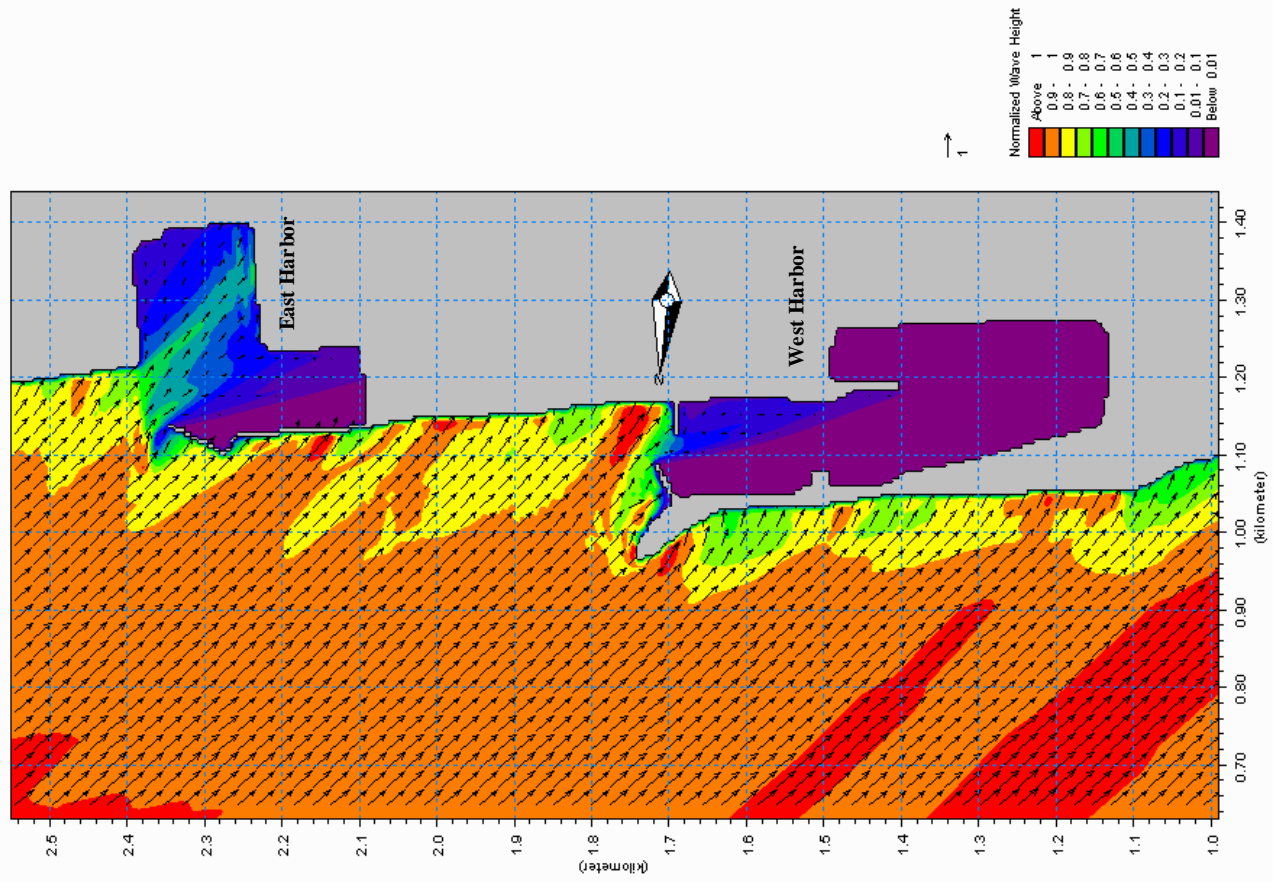
Simulated Velocities – Proposed Condition
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



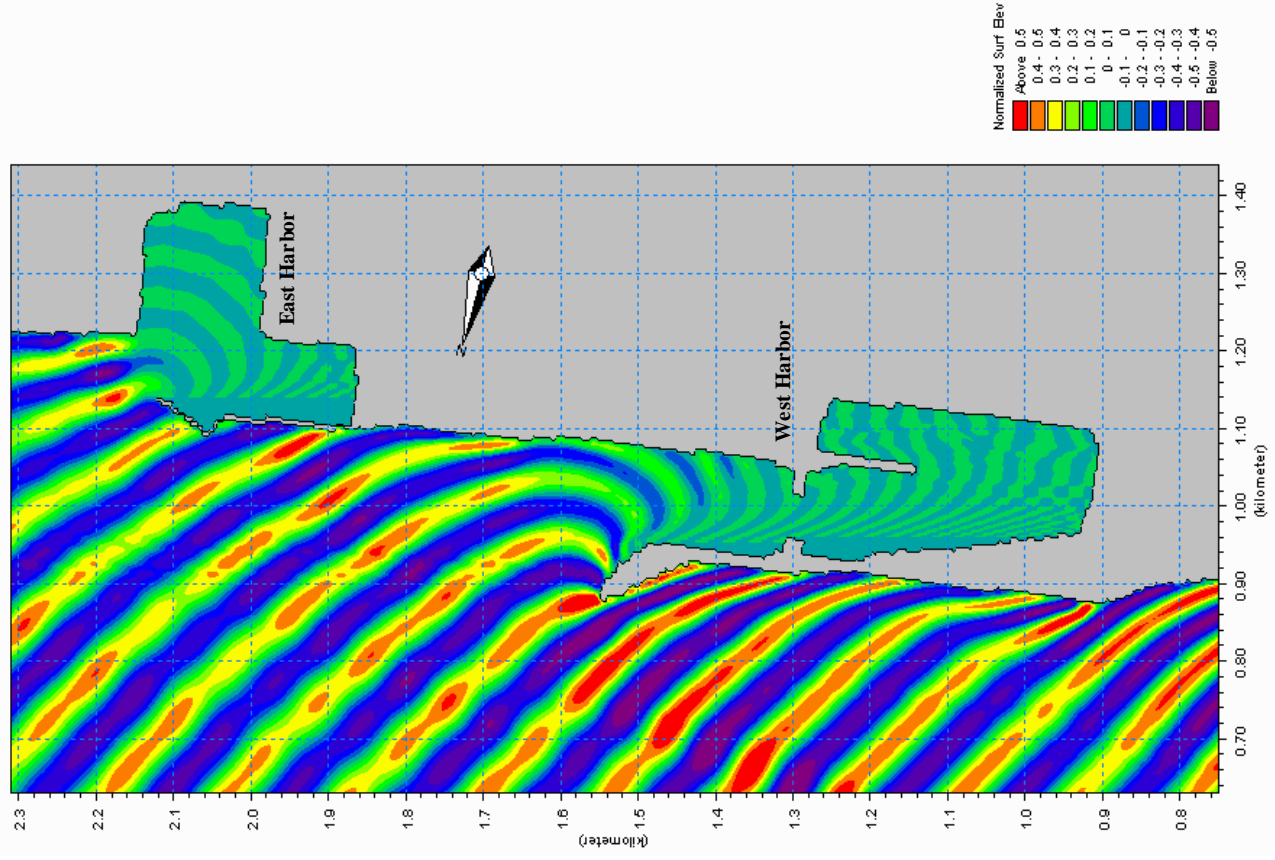
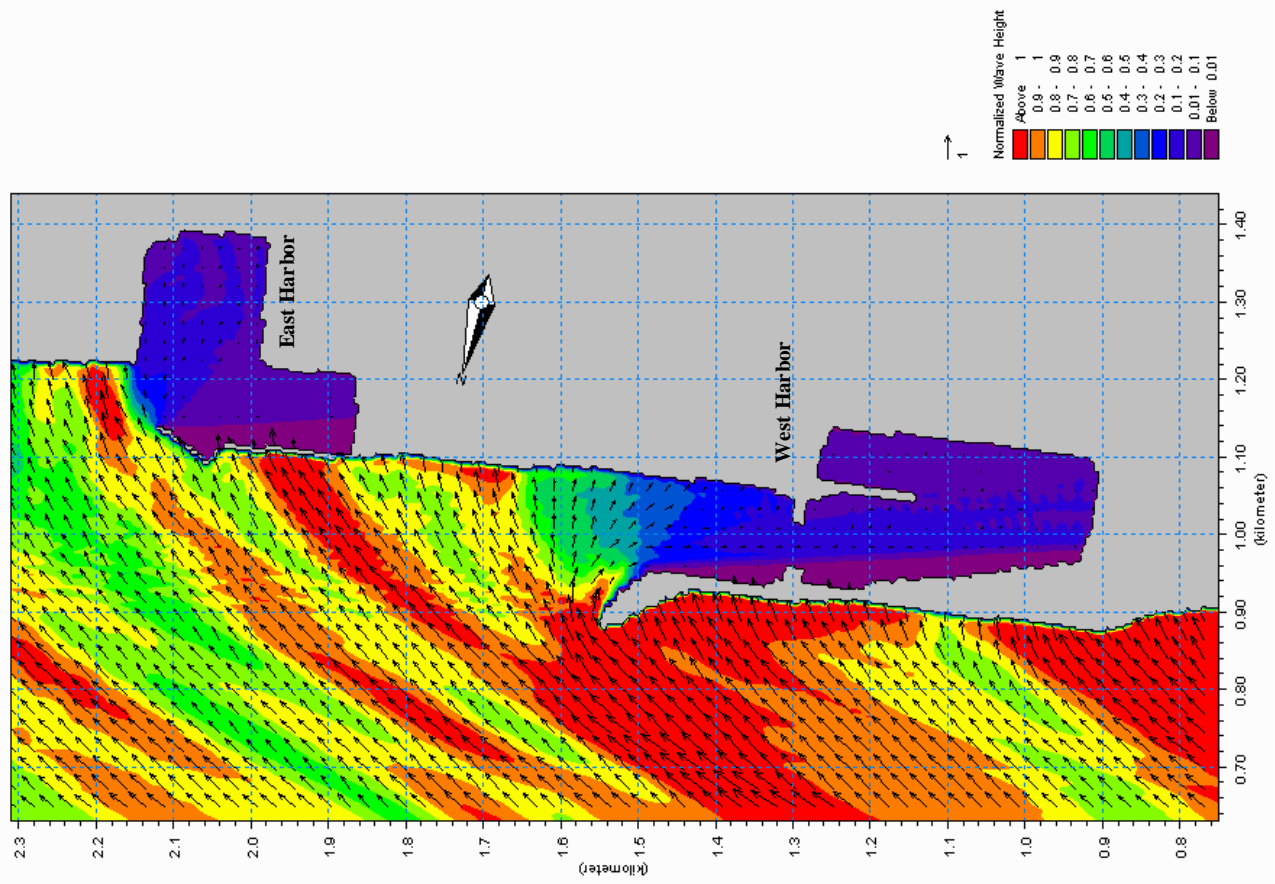
Velocity Differences Between Proposed and Existing Conditions
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



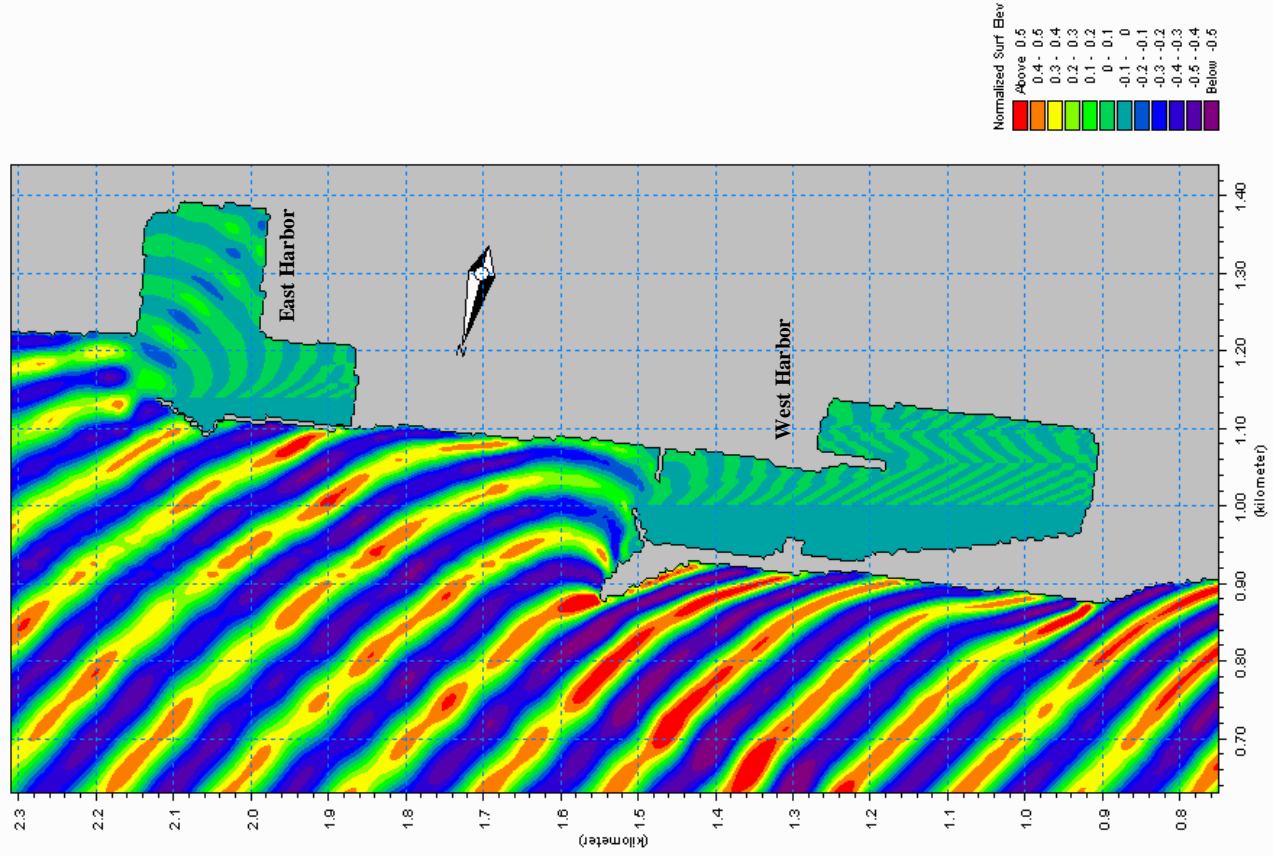
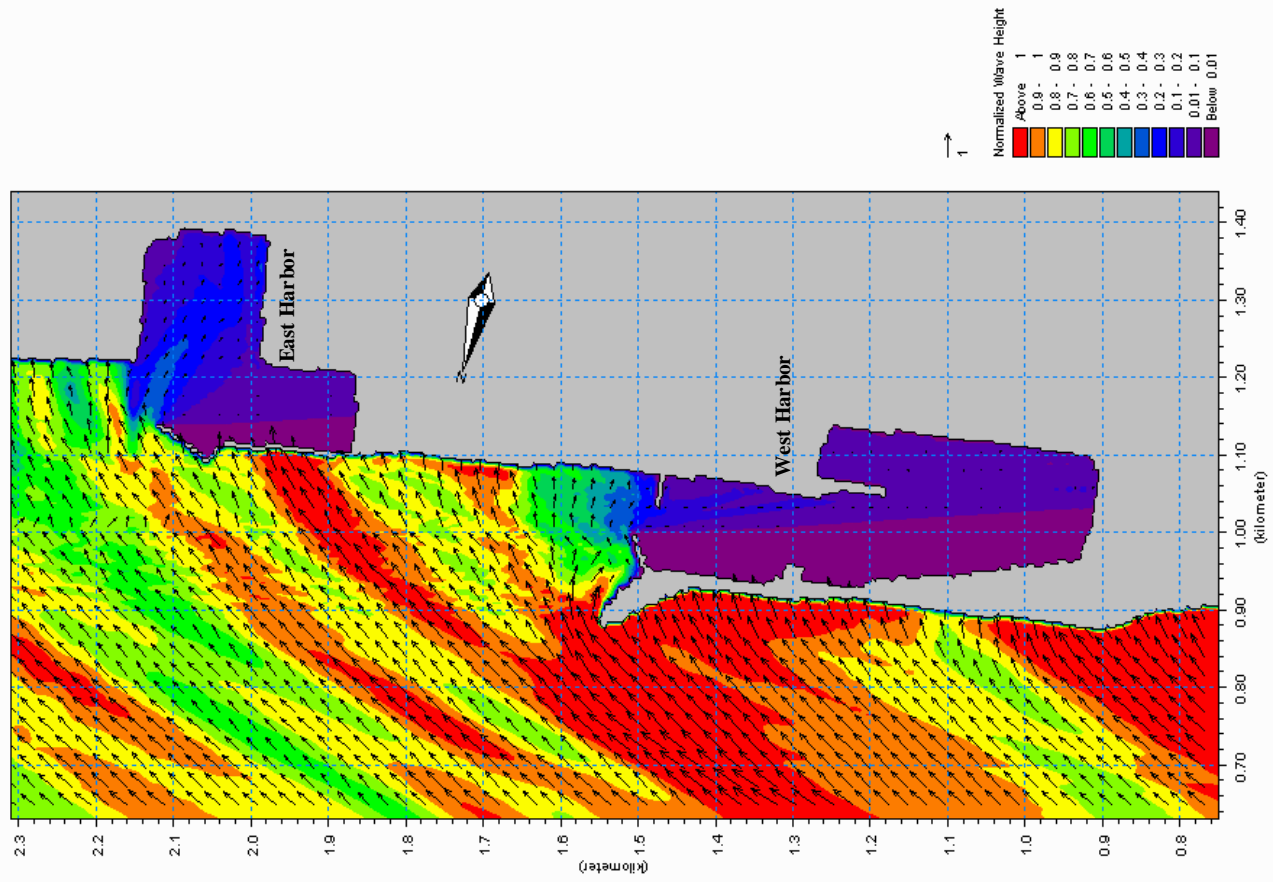
Existing Condition With NE Wave (Hrms = 0.5m, Tp=5s, $\theta=45^\circ$)
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



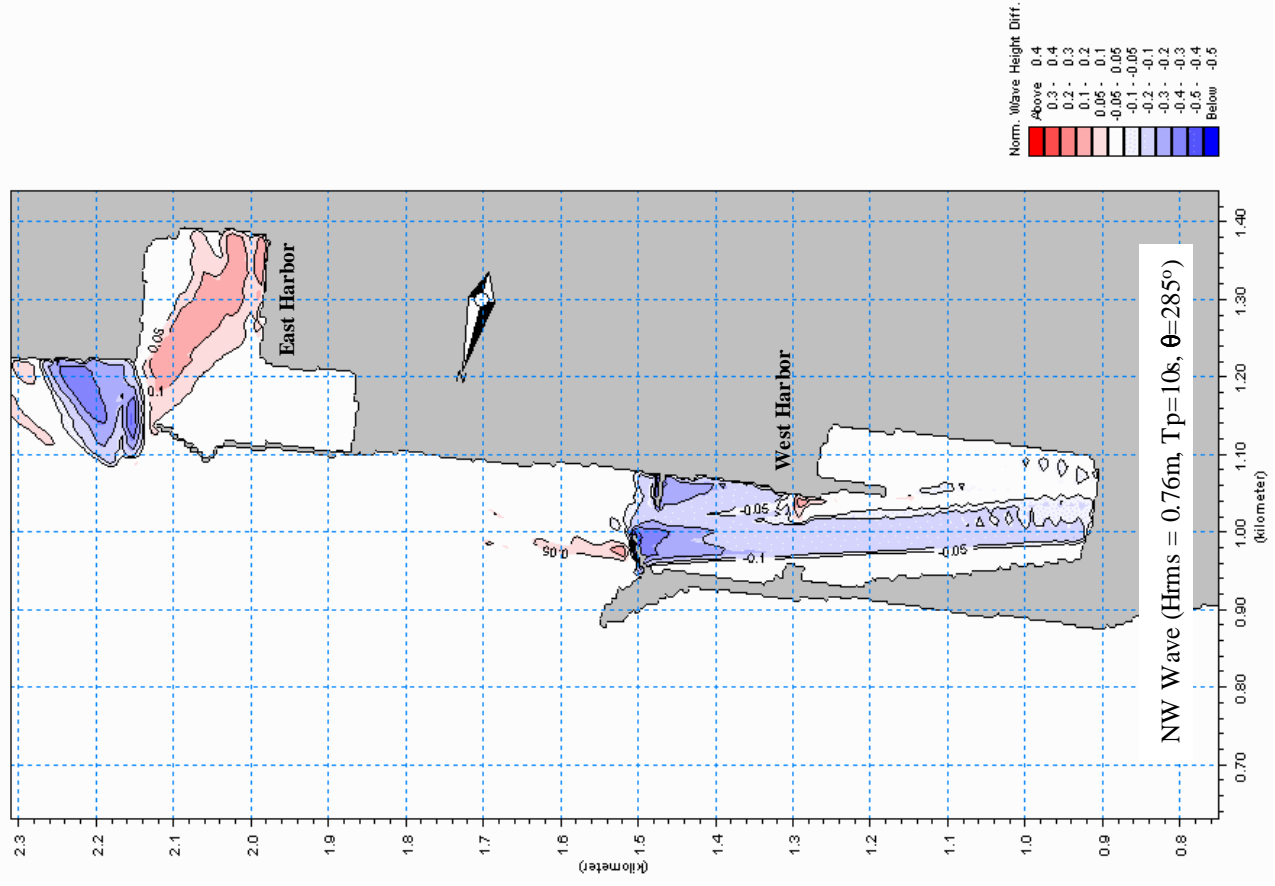
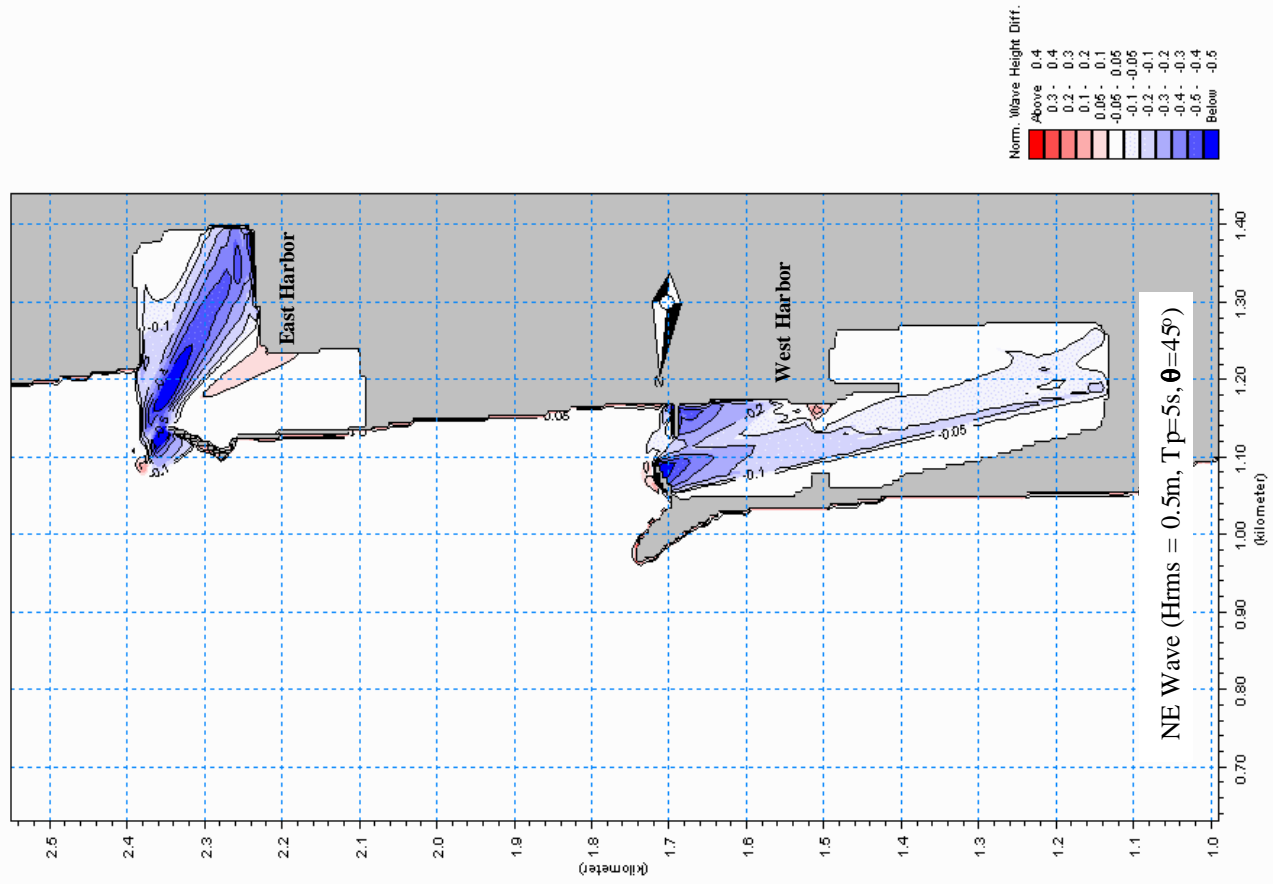
Proposed Condition With NE Wave ($H_{rms} = 0.5m$, $T_p = 5s$, $\theta = 45^\circ$)
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



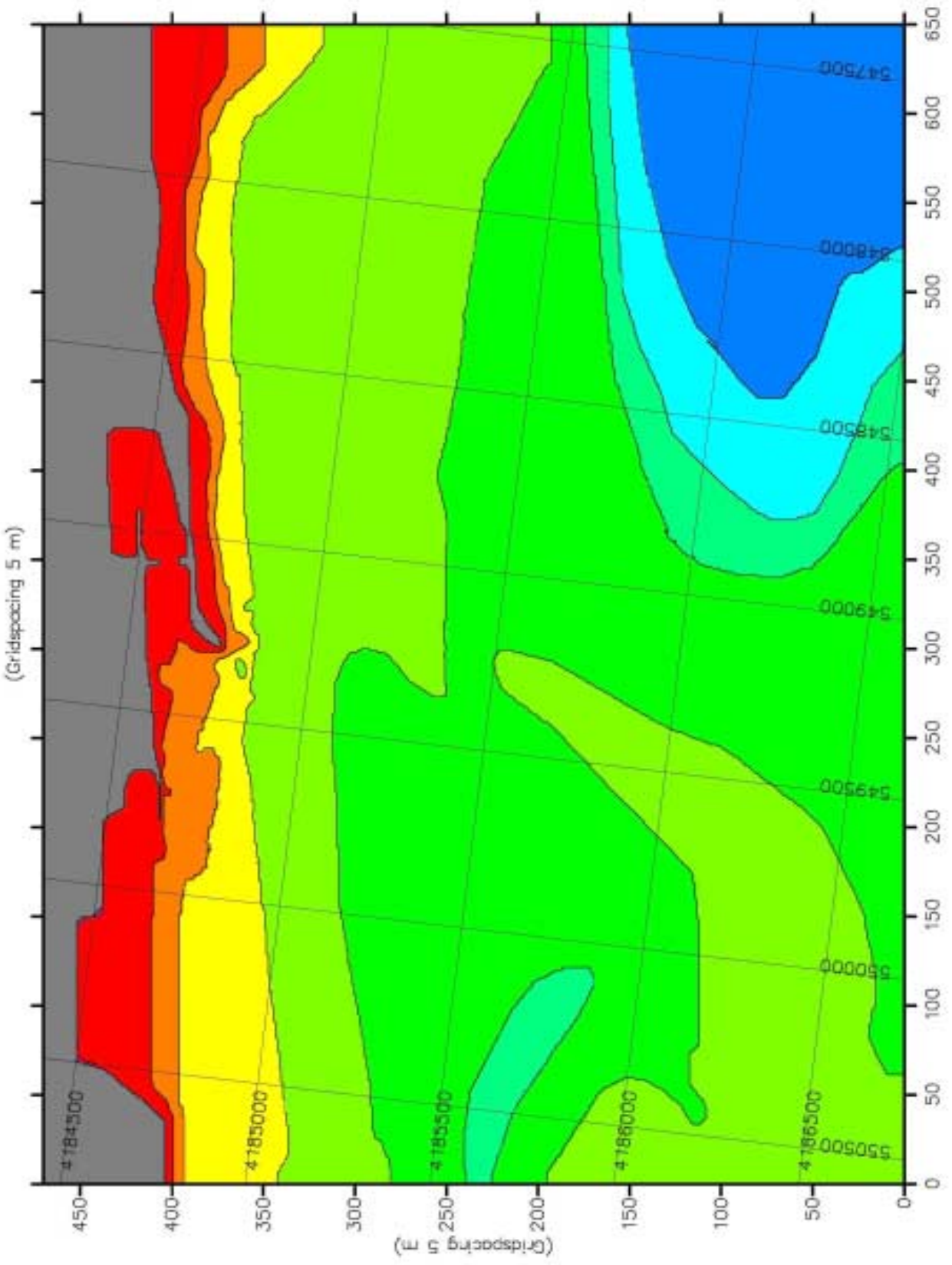
Existing Condition With NW Wave (Hrms = 0.76m, Tp=10s, $\theta=285^\circ$)
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



Proposed Condition With NW Wave (Hrms = 0.76m, Tp = 10s, $\theta = 285^\circ$)
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)

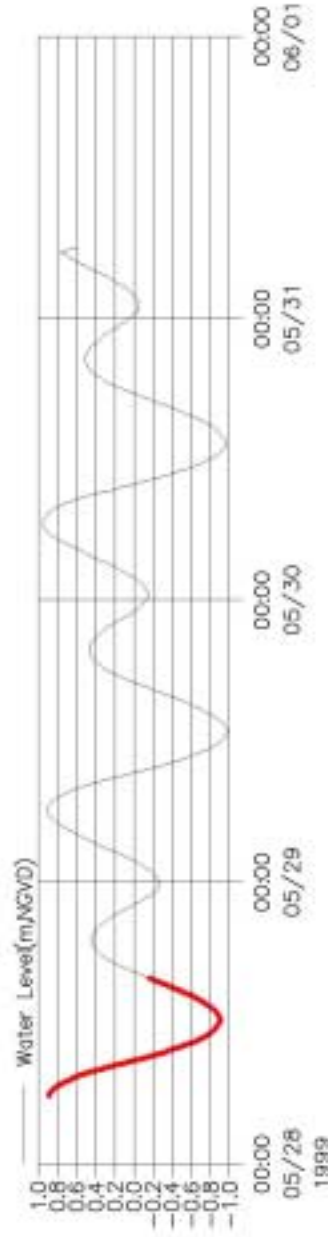
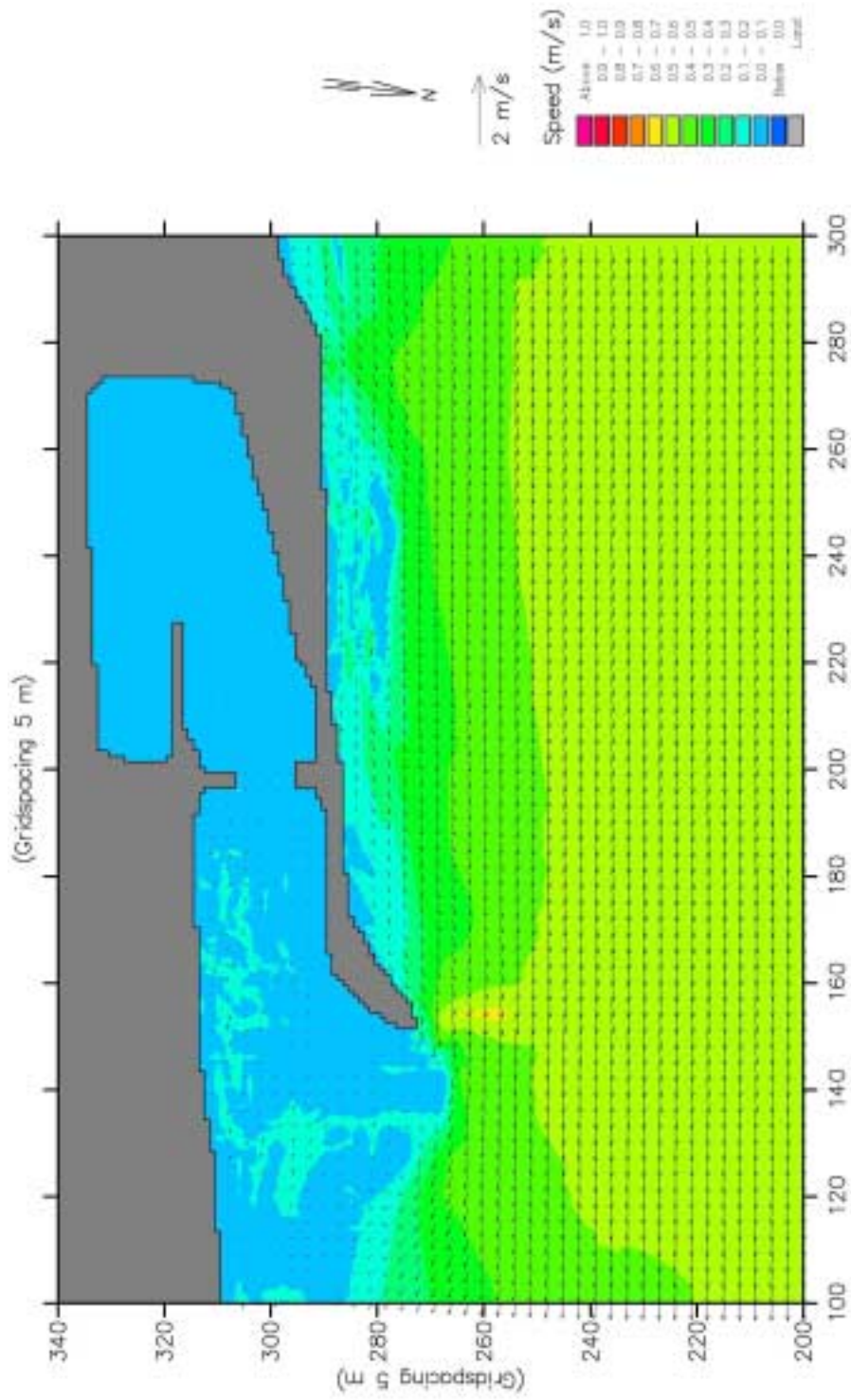


Normalized Wave Height Difference Between Proposed and Existing Conditions
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



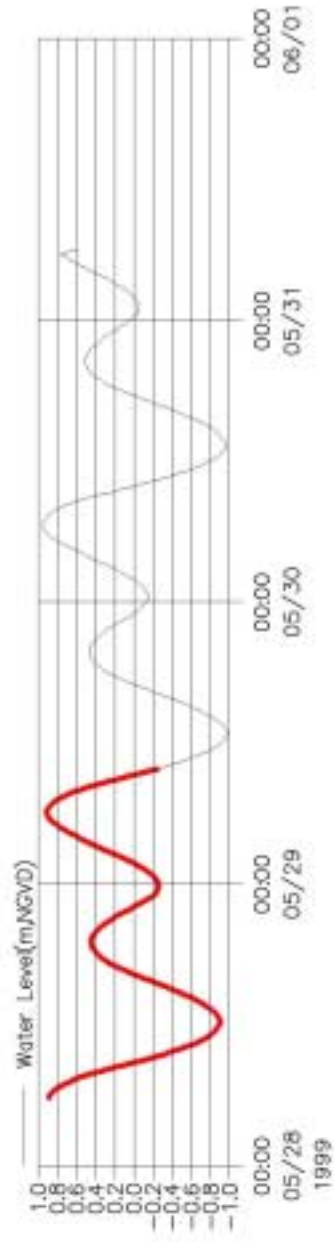
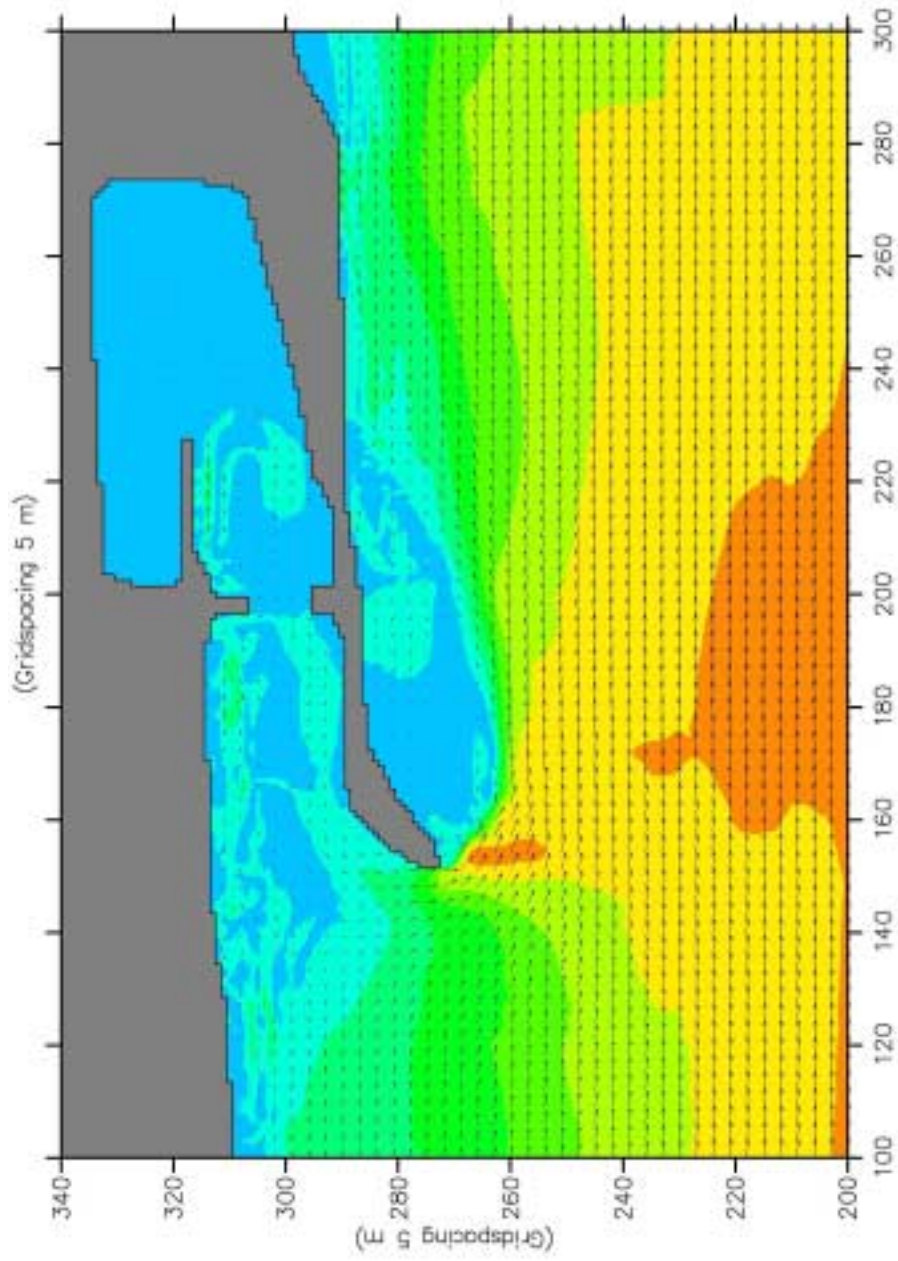
Model Domain & Bathymetry for Sediment Transport Study

(Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)



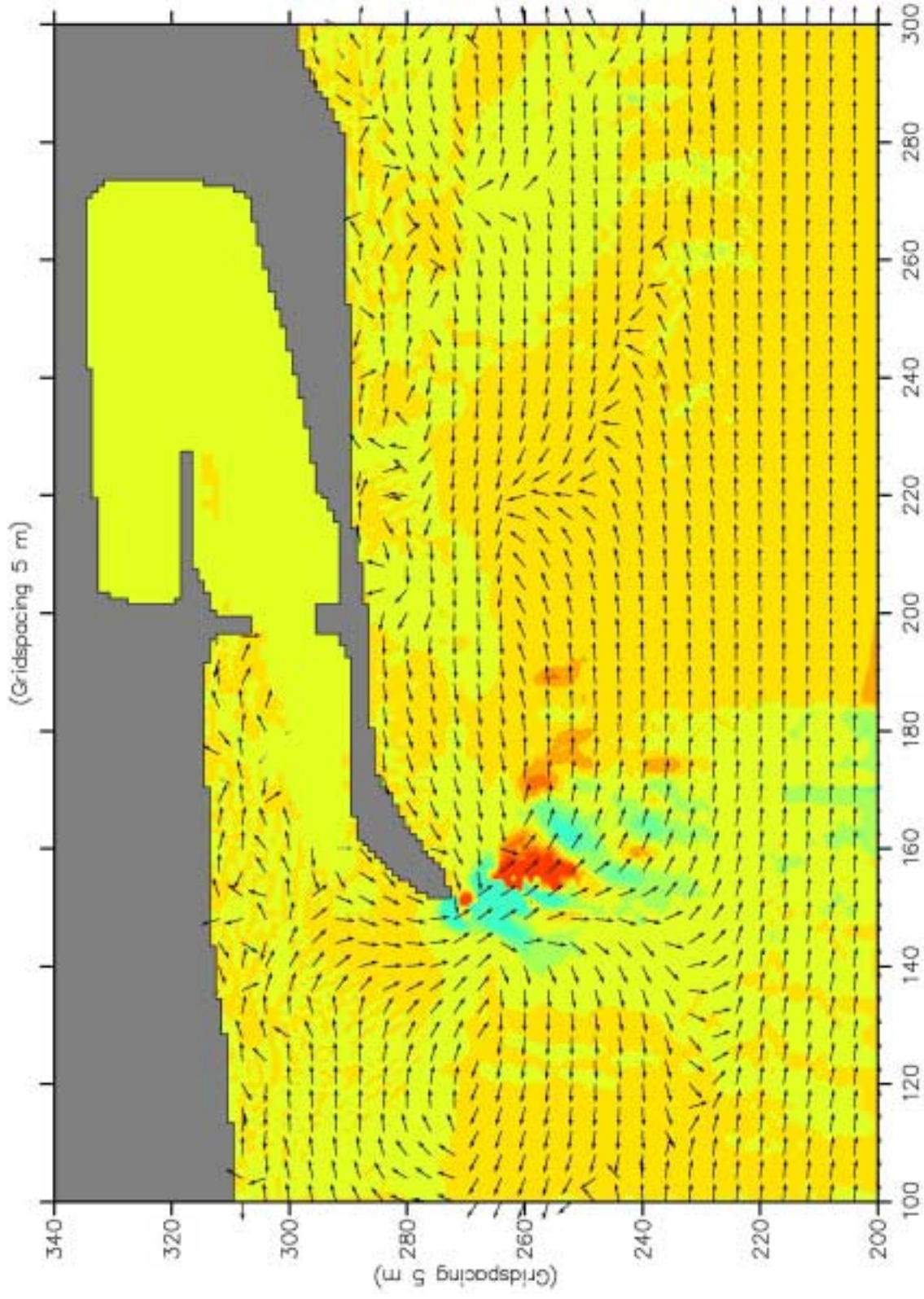
Flood Conditions and West Waves (Existing Case)

(Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)

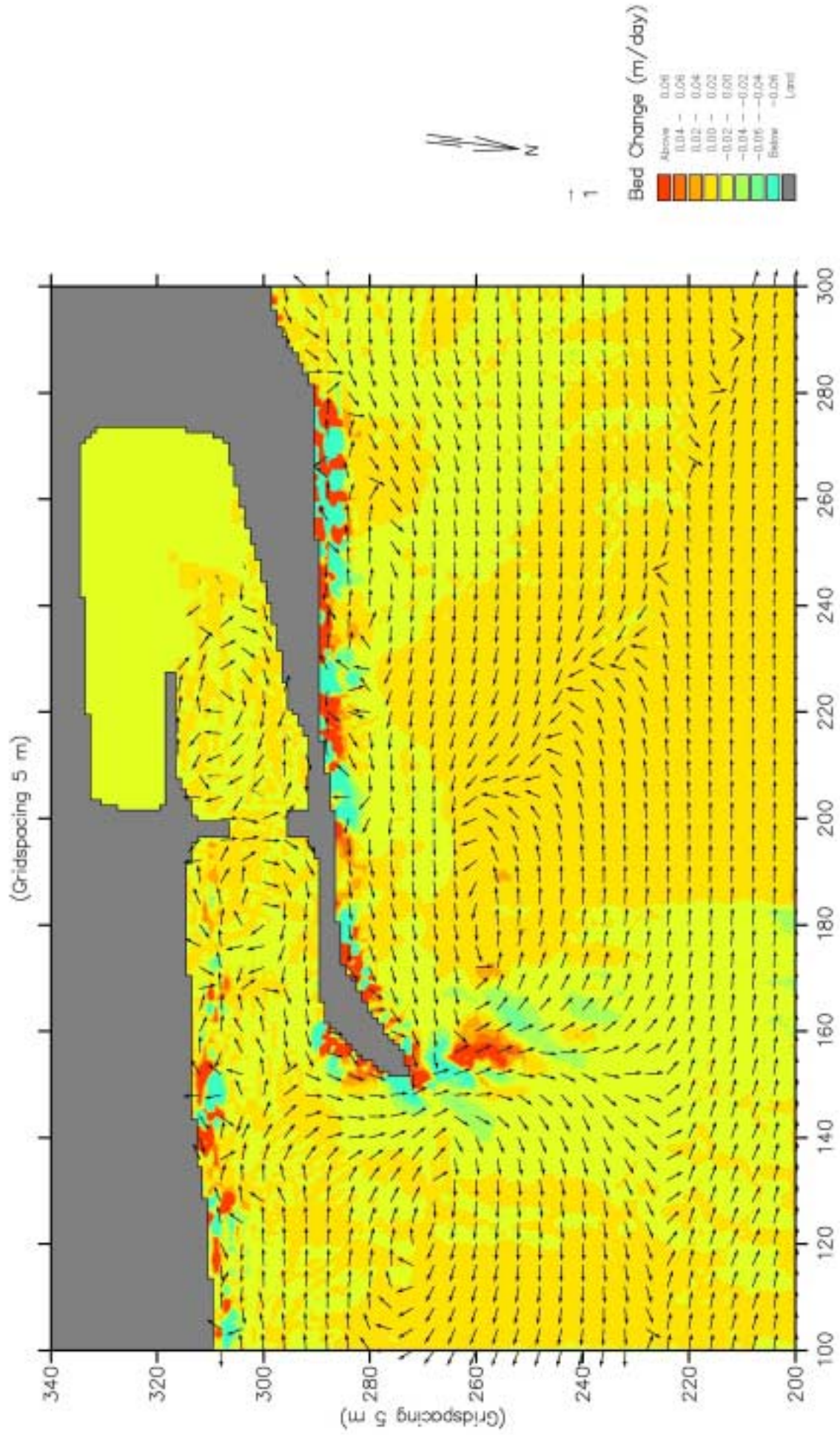


Ebb Conditions and Northeast Waves (Existing Case)

(Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)

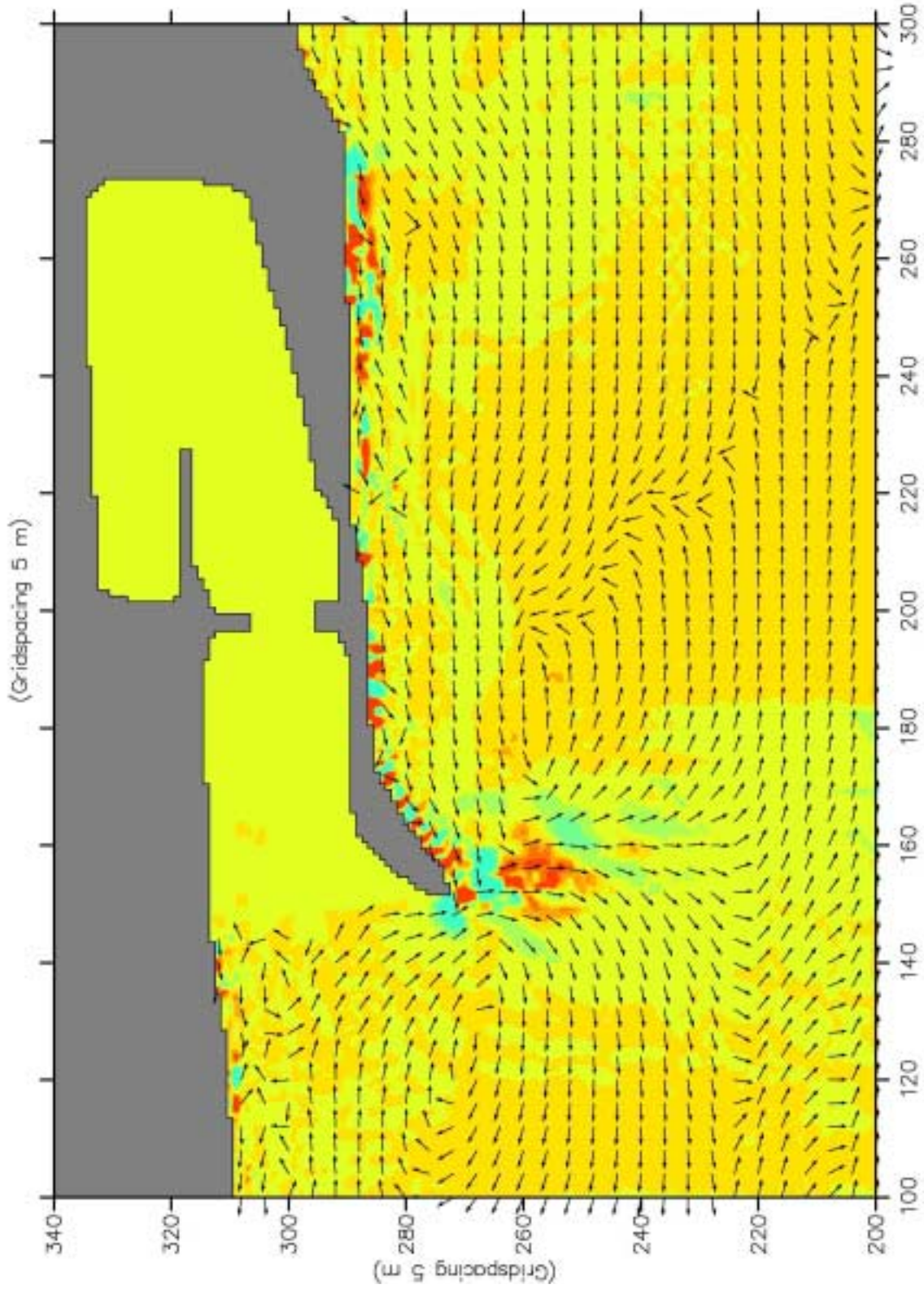


Transport for Existing Conditions (Tides Only)
 (Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)

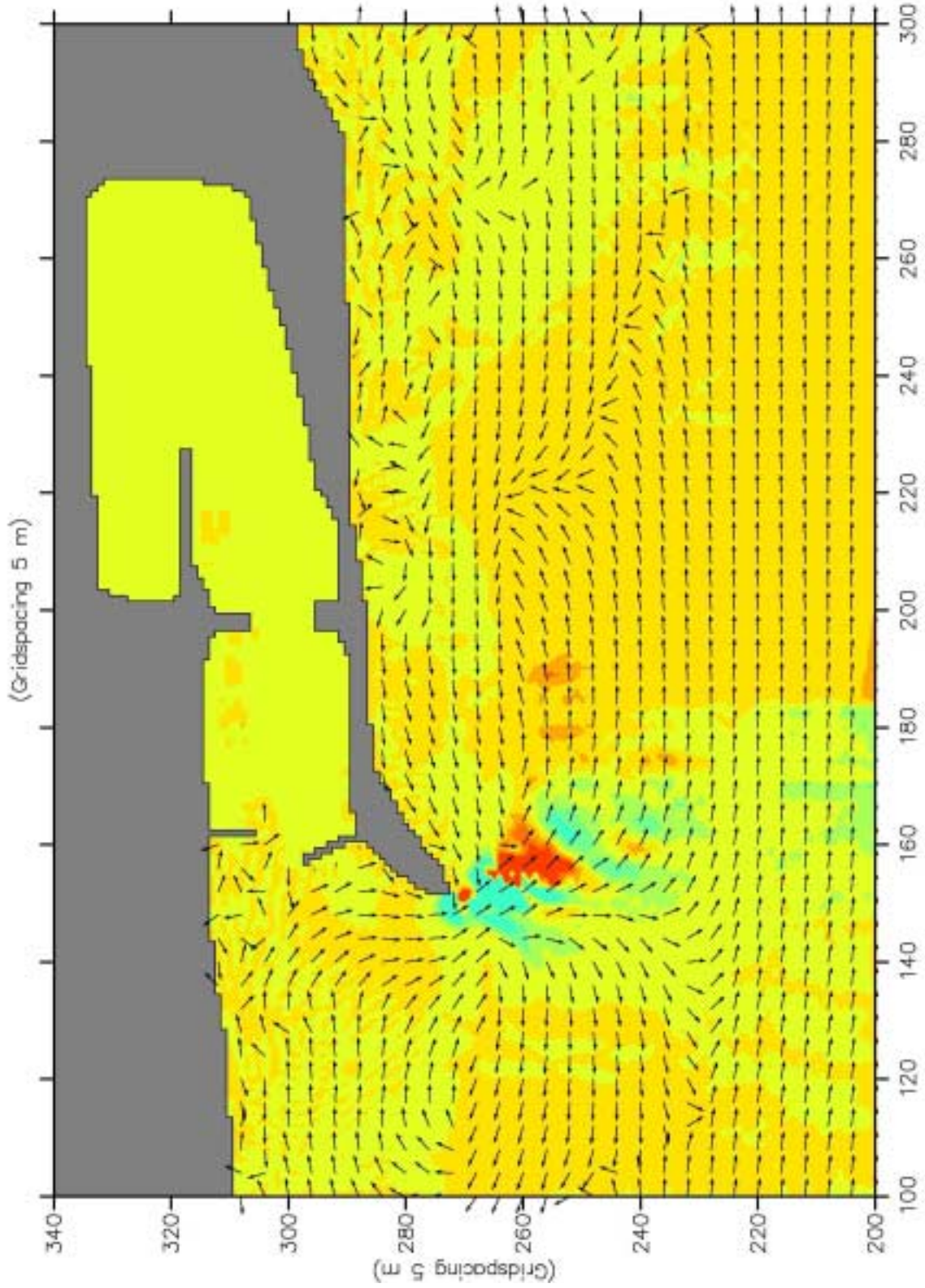


Transport for Existing Conditions (With Local Seas)

(Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)

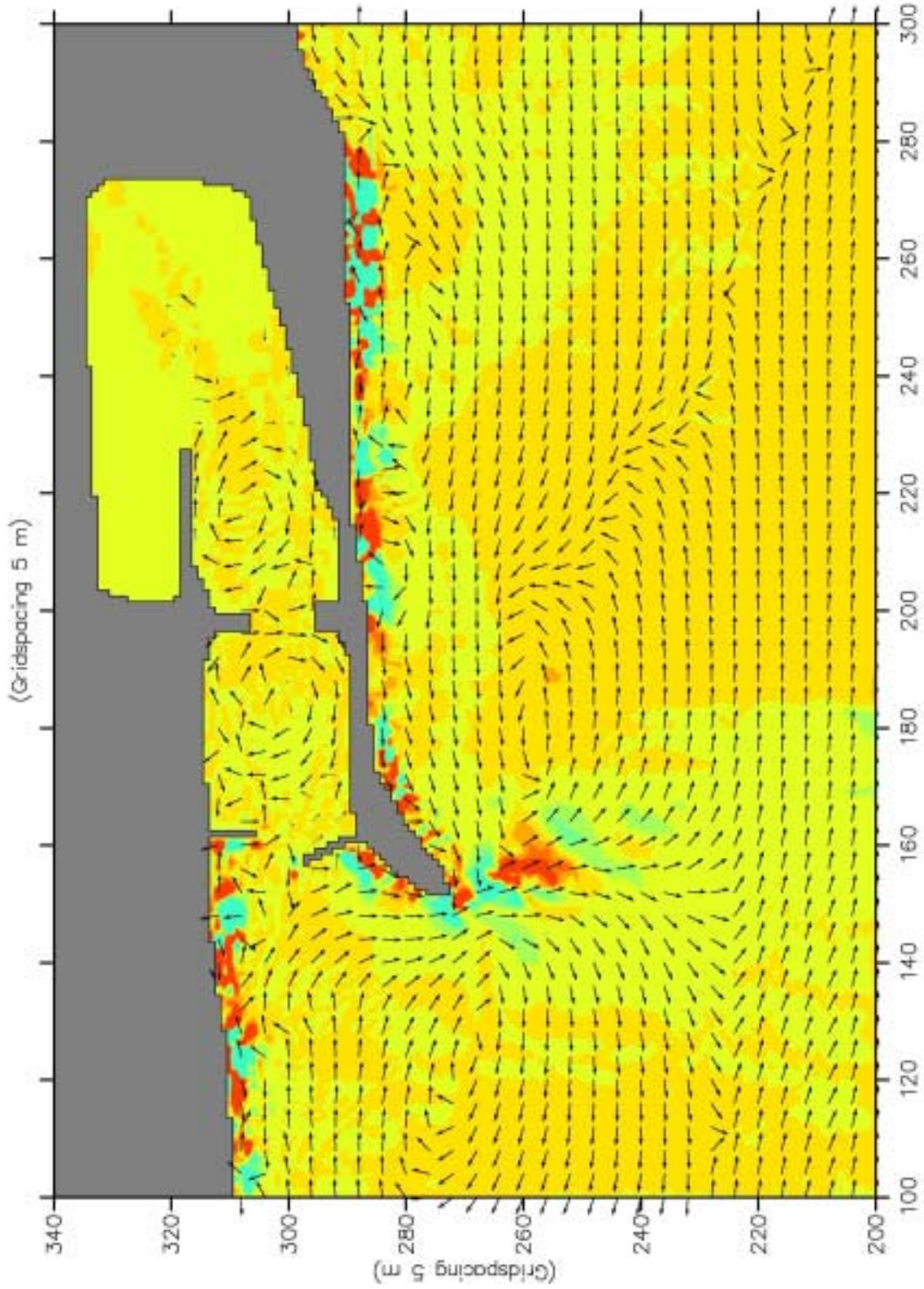


Transport for Existing Conditions (With Swells)
 (Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)



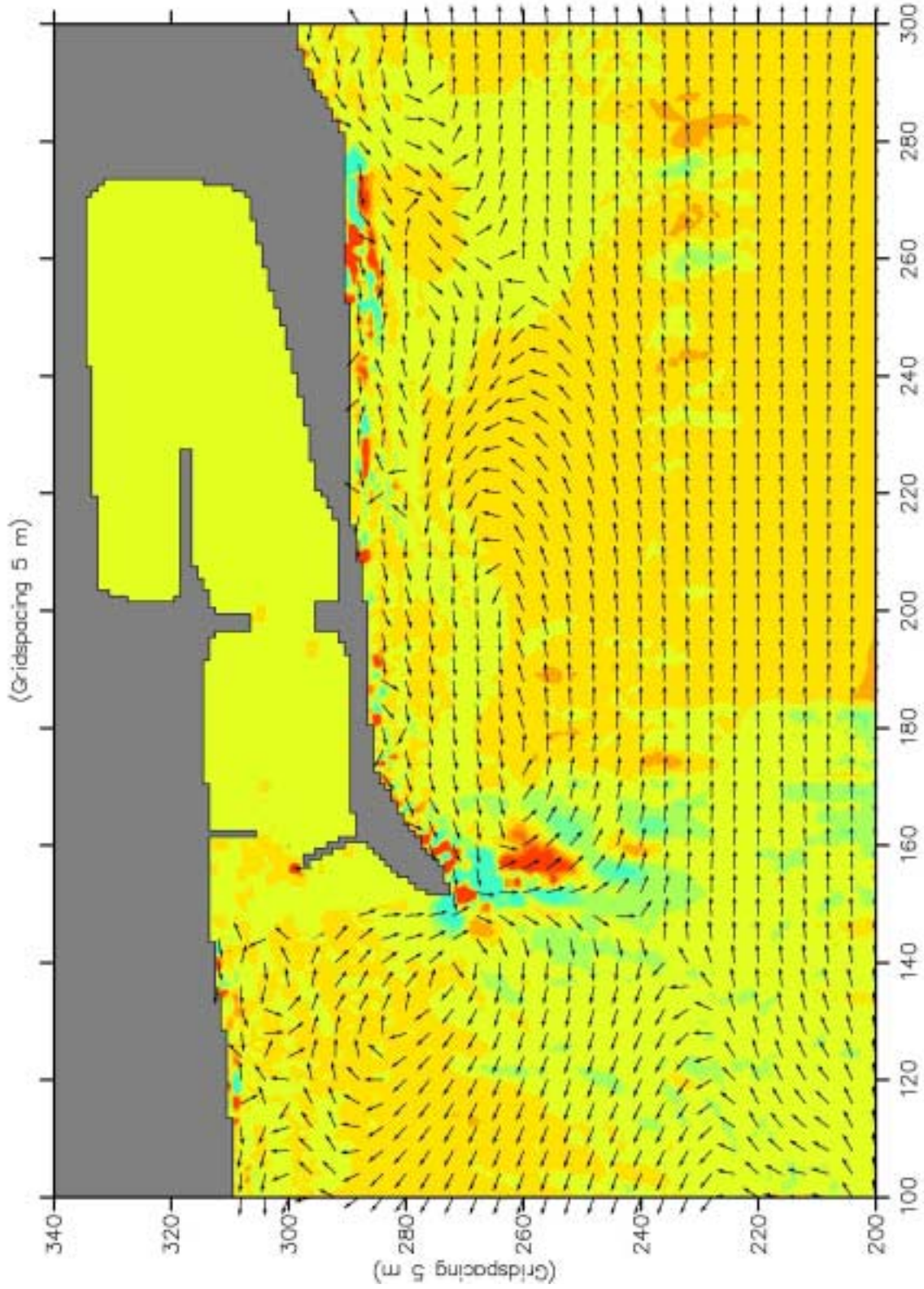
Transport for Breakwater Conditions (Tides Only)

(Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)



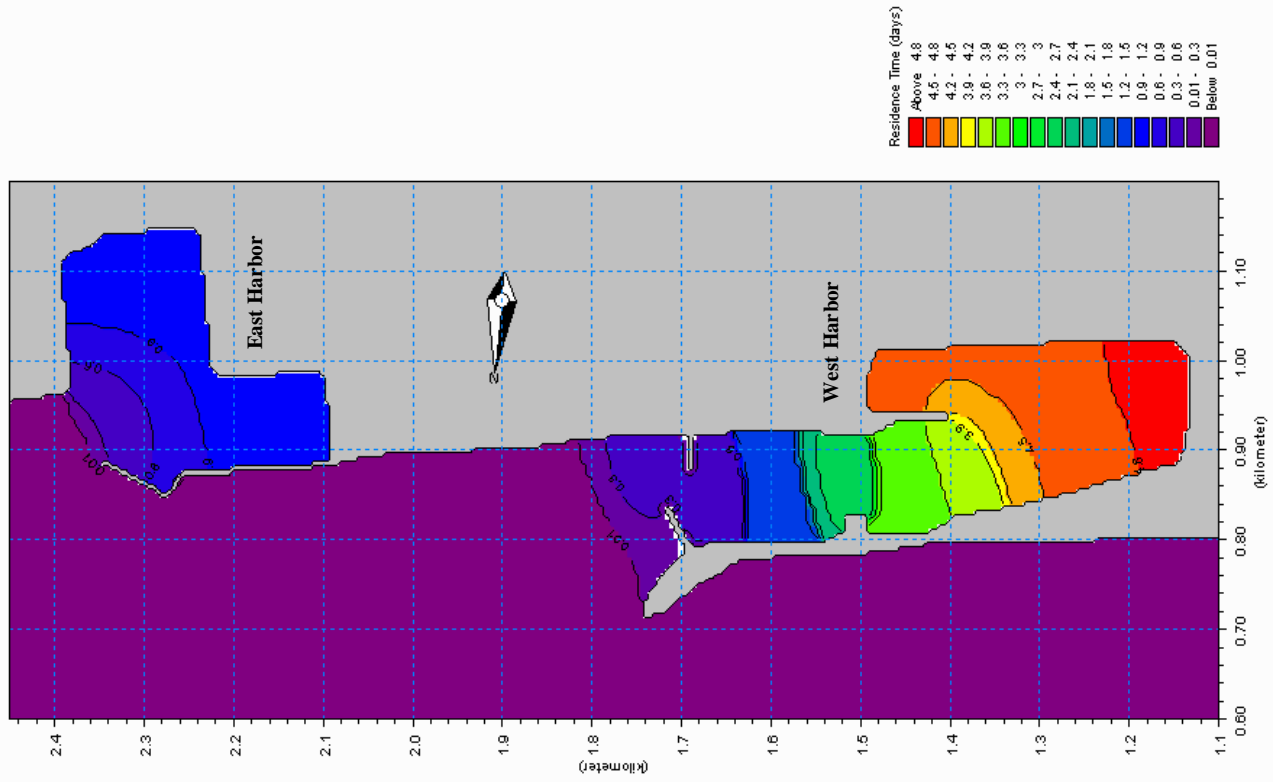
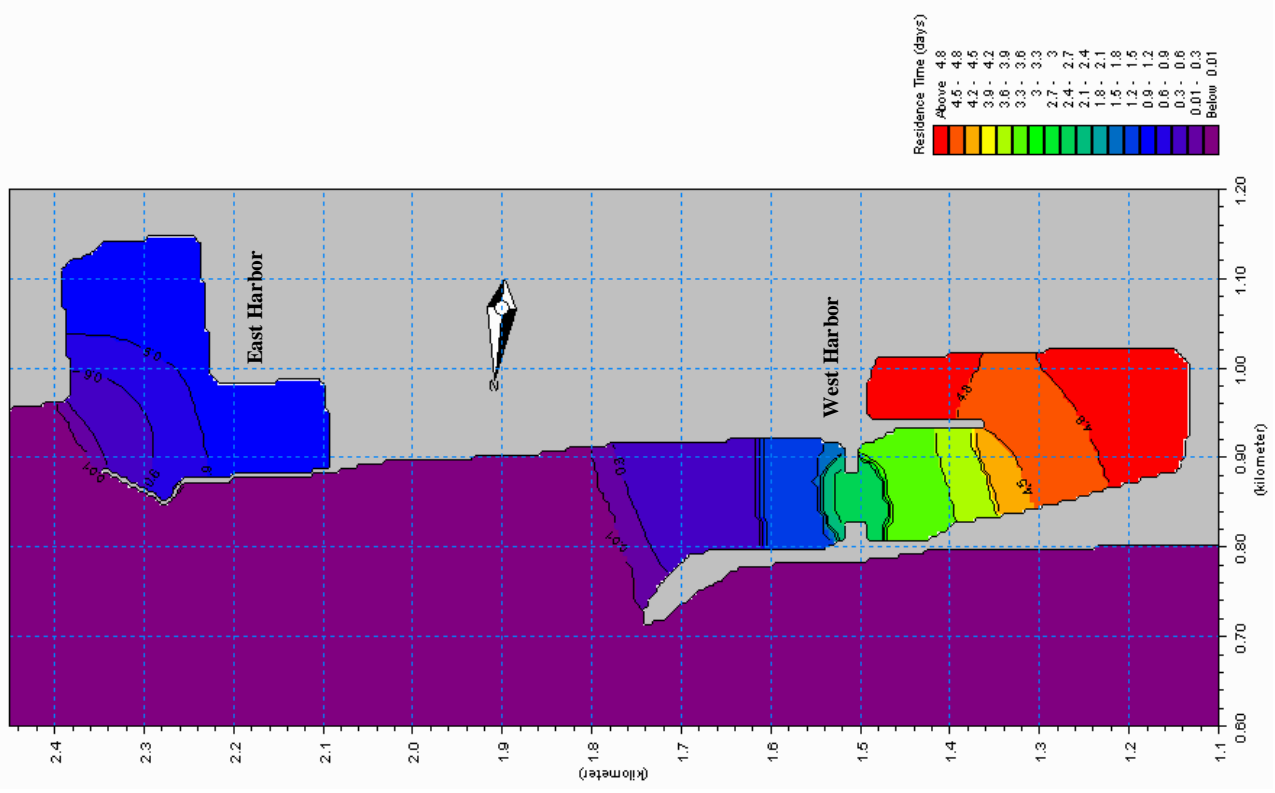
Transport for Breakwater Conditions (With Local Seas)

(Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)

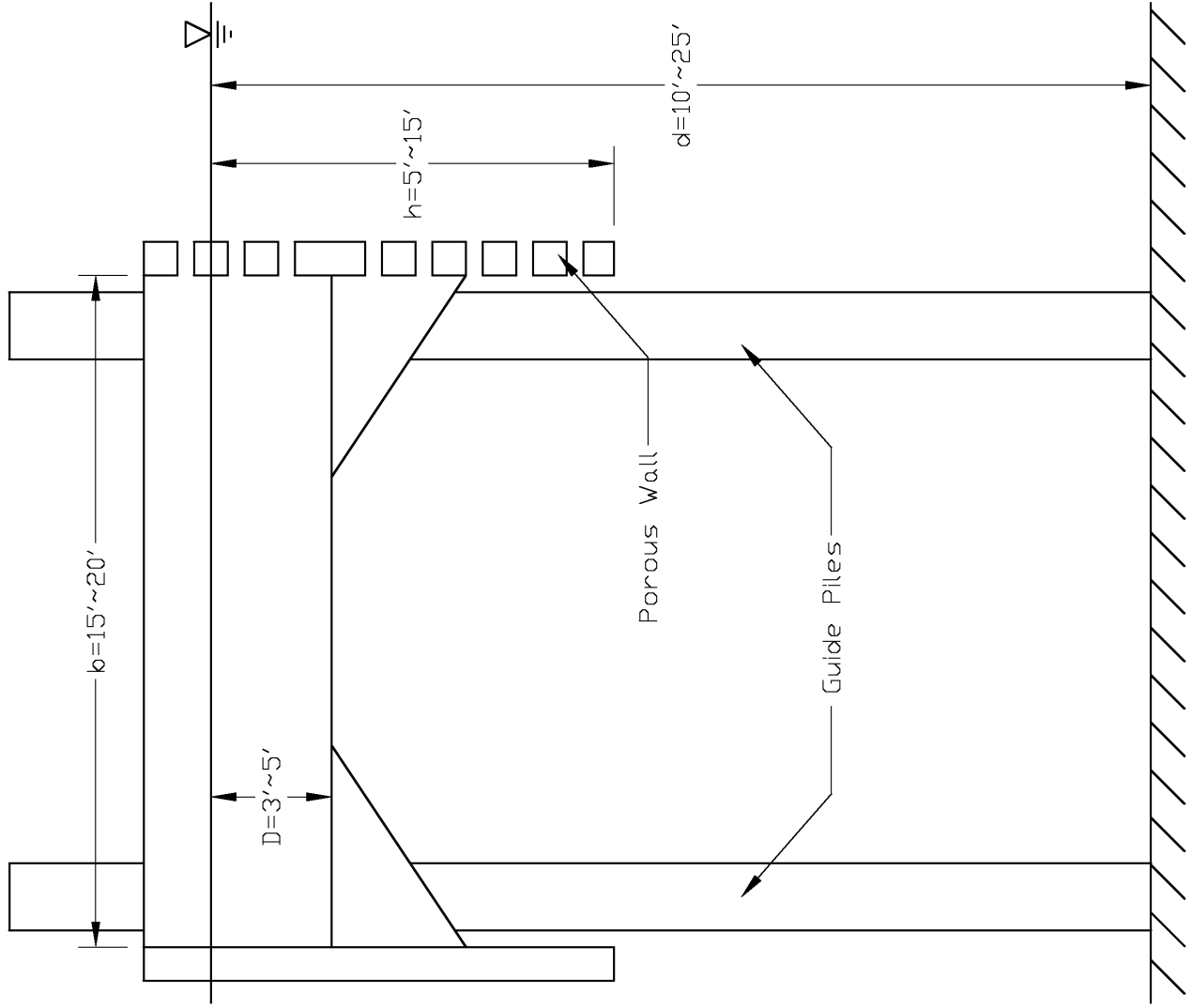


Transport for Breakwater Conditions (With Swells)

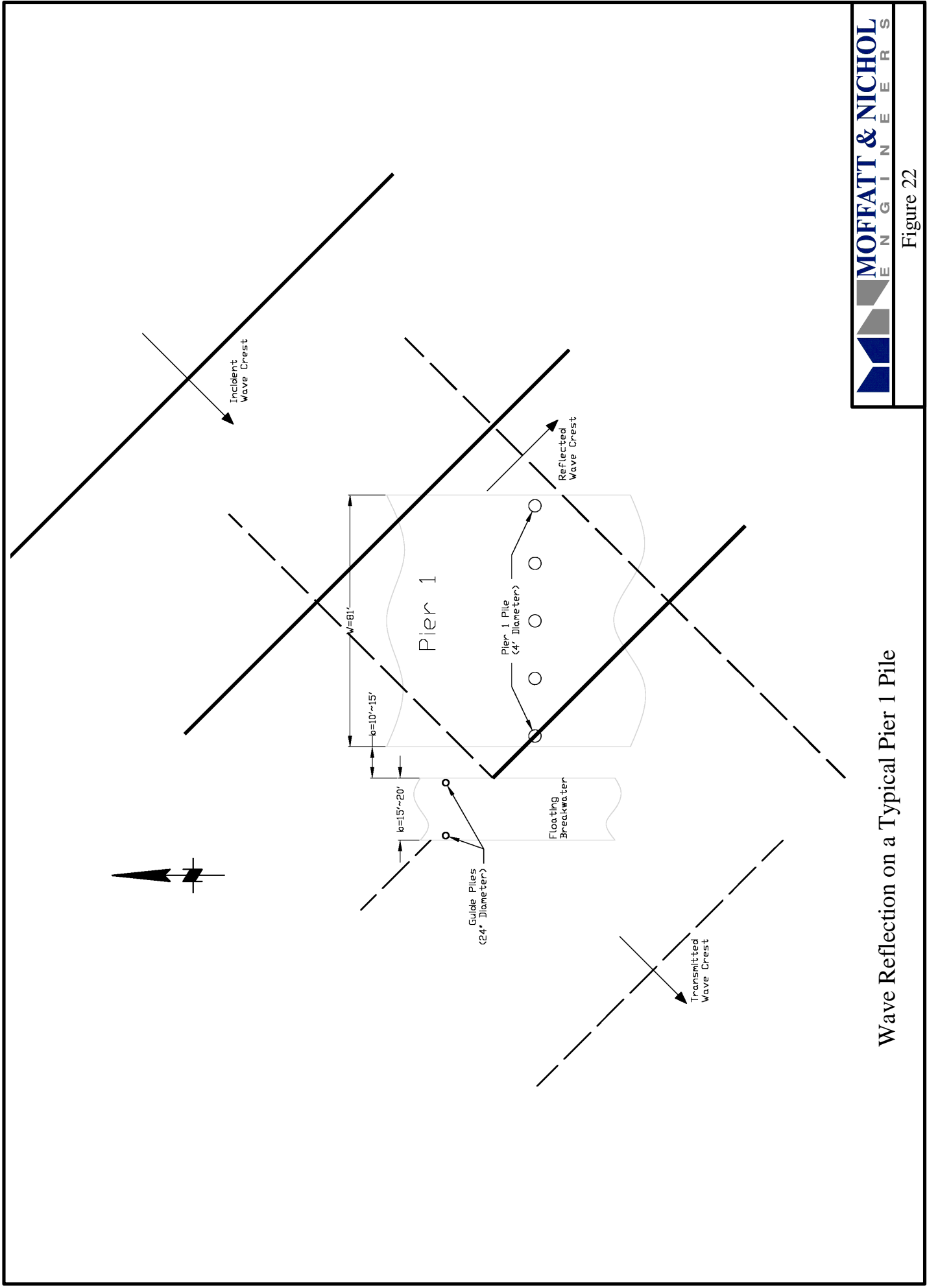
(Source: Moffatt & Nichol Engineers, Numerical Modeling Results – San Francisco Marina Breakwater Improvements, April 2000.)



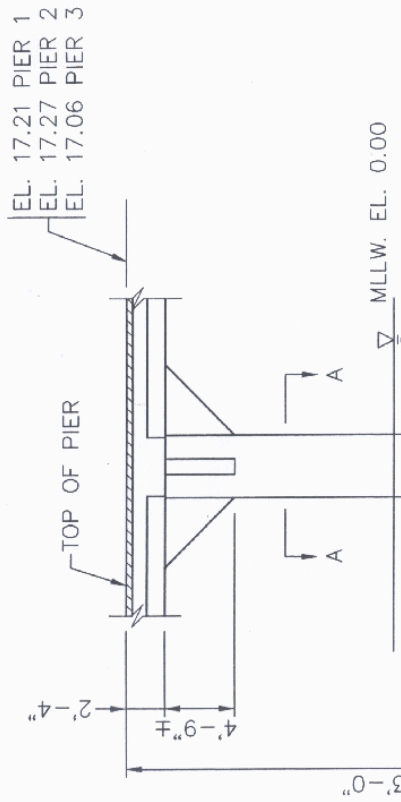
Simulated Residence Times – Existing Condition (left) and Proposed Condition (right)
 (Source: Moffatt & Nichol Engineers, Supplemental Engineering Study to Support Environmental Review of Marina Renovation Project, December 2003.)



Conceptual Floating Breakwater

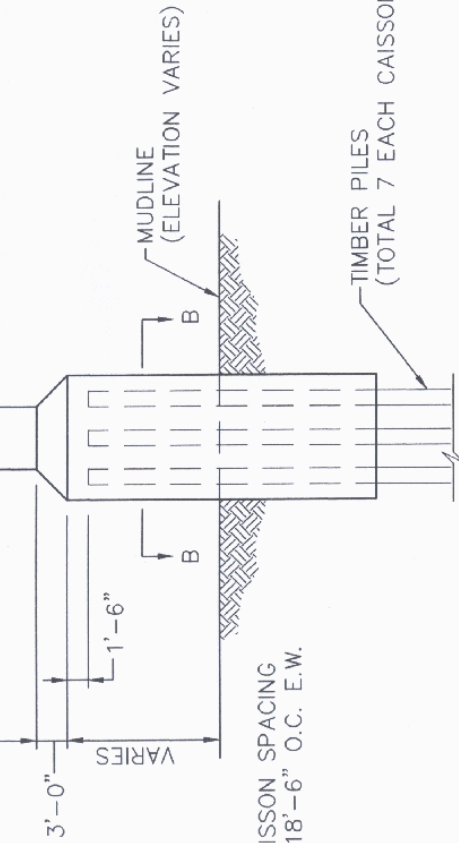


Wave Reflection on a Typical Pier 1 Pile



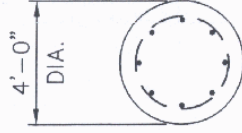
NOTE:
FOR CAISSONS AT THE INBOARD END OF PIER 3
CLOSE TO THE SEAWALL, TIMBER PILES ARE
OMITTED AND THE BASE OF CAISSONS REST ON
TOP OF ROCK.

NOTE: CAISSON SPACING
@ 18'-6" O.C. E.W.



SECTION B-B

SCALE: 1/4"=1'-0"

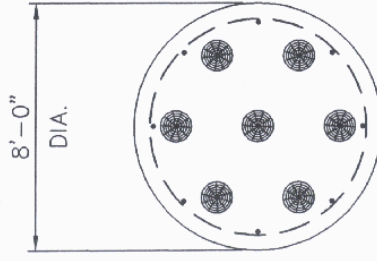


REINFORCEMENT:

8-3/4" DIA.
VERT. BARS
1/2"φ HOOPS @ 24"

SECTION A-A

SCALE: 1/4"=1'-0"



REINFORCEMENT:

8-3/4" DIA.
VERT. BARS
1/2"φ HOOPS @ 24"

NOTE: THIS INFORMATION WAS
BASED ON 1933 DRAWINGS
OBTAINED AT THE PRESIDIO DEH.

Typical Pier 1 Pile

(Source: Moffatt & Nichol Engineers, Fort Mason Campus Survey, Piers 1, 2 and 3 Structural Evaluation, M&N File
No. 4326-01, June 18, 1999.)