

**UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE**

RECORD OF DECISION

FORT BAKER PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

**FORT BAKER
GOLDEN GATE NATIONAL RECREATION AREA**

INTRODUCTION

Pursuant to §102 (2)(C) of the National Environmental Policy Act of 1969, Public Law 91-190, as amended, and the regulations promulgated by the Council on Environmental Quality (40 CRF 1505.2), the Department of the Interior, National Park Service (NPS) has prepared the following Record of Decision on the *Fort Baker Plan* and *Final Environmental Impact Statement* (FEIS).

This document is a concise statement of the decisions that were made, the alternatives considered (including identification of the environmentally preferred alternative), the basis for the decision, and the mitigating measures developed in order to avoid or minimize environmental impacts. It also provides background information on the project and the public involvement process that was used to develop and refine the proposed plan and alternatives.

DECISION

The NPS will amend the *1980 Golden Gate National Recreation Area General Management Plan* as it pertains to Fort Baker in accordance with the Proposed Action Alternative as described and analyzed in the *Fort Baker Plan* and *Final Environmental Impact Statement* (EIS). The Fort Baker Plan Draft EIS was issued in October 1998 for a 60-day public review and comment period, and the Final EIS was released in October 1999. The Final EIS is comprised of two volumes: Volume I (Draft EIS, as amended); and Volume II (Response to Comments).

PROJECT BACKGROUND AND PUBLIC INVOLVEMENT

Project Purpose

Public Law 92-589 established the Golden Gate National Recreation Area (GGNRA) in order to "...preserve for public use and enjoyment...outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning..." (16 USC 460bb). According to 16 USC 460bb(2), "...the easterly half of Fort Baker in Marin County, California shall remain under the jurisdiction of the Department of the Army. When the property is determined by the Department of Defense to be in excess of its needs, it shall be transferred to the jurisdiction of the Secretary [of the Interior] for purposes of this Act." In 1995, the remaining military land at Fort Baker was determined to be excess to the needs of the military by the Department of Defense's Base Realignment and Closure Committee and was required to be transferred to the National Park Service, consistent with Public Law 92-589, by the year 2001.

The Fort Baker site includes a Historic District listed on the National Register of Historic Places containing 45 contributing features (including post-civil war era coastal fortifications), a marina and waterfront area, and important open space and scenic and natural areas including habitat for the federally listed endangered mission blue butterfly. The National Park Service must provide for the reuse of Fort Baker as a new unit of the National Park System consistent with the requirements of Public Law 92-589 which established the GGNRA, and with the Organic Act of 1916 which established the National Park Service. The Organic Act of 1916, as amended provides the overall mission statement and guiding principle for National Park Service which states that:

“The fundamental purpose of all units of the National Park Service is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”

The National Park Service must also comply with the requirements of the National Historic Preservation Act and thoroughly evaluate the effect of projects on historic properties. In keeping with these authorities, Section 1.2 of the Final EIS stated that the purpose of the EIS was to identify:

- The program and types of uses that would be accommodated in historic buildings and generate adequate revenue for building rehabilitation and preservation;
- Improvements to facilitate public uses, including new construction and removal of buildings, landscape treatments, trails, parking, circulation, and locations and patterns of use;
- Waterfront improvements;
- Opportunities for habitat restoration; and
- An approach to the protection, rehabilitation and maintenance of the historic and natural resources.

Public Involvement

Following the 1995 closure announcement, the National Park Service implemented a public planning effort to develop a plan for the future use and preservation of the site and its resources. In December 1995 and January 1996, the National Park Service developed a proposed framework for the planning process. This framework was presented and discussed with local planning agencies and the public, and a formal presentation was made at the January 1996 GGNRA Advisory Commission meeting. Public involvement was integral to the development of the plan, its goals and objectives, and the mitigation measures presented in the Final EIS.

The first step in the public planning process was a scoping process that was initiated through a notice published in the Federal Register on August 19, 1997. A Notice of Intent to prepare an EIS was published in the Federal Register on May 4, 1998. The scoping process included an evaluation of the approved *1980 Golden Gate National Recreation Area General Management Plan (GMP)* and development of goals and objectives for the Fort Baker Plan. The 1980 GMP provides a comprehensive land use plan for the lands within the Golden Gate National Recreation Area, including specific reuse concepts for Fort Baker. The 1980 GMP envisioned that Fort Baker would accommodate a variety of uses including a 350-person educational conference center, a 150-person environmental study area, a 200-person hostel, ferry service, a 700- car parking lot to stage shuttle service to the Marin Headlands, and short-term public berthing at the marina. These land uses and programs were reviewed within the context of current site

conditions, and other recreational and educational uses that had been established within the GGNRA since 1980. This evaluation showed that a reduction in the overall intensity of use originally envisioned for Fort Baker was desirable to protect the site's resources, and to avoid duplication or competition with public programs already offered at other places within the park. The 1980 GMP land uses were scaled back, and some uses eliminated, in the development of the Fort Baker Plan (the Proposed Action Alternative evaluated in the EIS). A more detailed description of the 1980 GMP land use concepts is provided below as part of the "Alternatives Considered" discussion. As part of the most recent planning effort, draft goals and objectives for the project were developed with the public, and used to refine and screen various alternatives (see "Basis for Decision" section).

More than 50 public meetings, workshops, site tours, and meetings were held over the course of the planning process. Thousands of public notices, planning updates and public input surveys were sent to the public to further solicit input and maintain active public participation in the development and evaluation of alternatives for the Fort Baker Plan. Many alternatives were developed and considered, and three "action" alternatives were carried forward for additional evaluation in the EIS. The environmental review process provided additional opportunities for public input and involvement through meetings, open houses, presentations, and public review and comment on the Draft EIS. Planning updates and opportunities for public comment were also provided at more than 10 publicly noticed meetings of the GGNRA Advisory Commission during the planning and environmental review process. During the 60-day public review period for the Draft EIS, 127 letters, e-mail messages, and oral comments (at the November 18, 1998 GGNRA Advisory Commission meeting) were received. The National Park Service reviewed and responded to all comments in the Final EIS, which was released on October 15, 1999. Additional analysis of issues of concern and new and/or more refined mitigation measures were developed and included in the Final EIS in response to public review and comment.

An overview of the Final EIS was also presented to the GGNRA Advisory Commission at a public meeting on November 16, 1999. Following release of the Final EIS, the National Park Service received written comments and, at the November 16, 1999 GGNRA Advisory Commission meeting, oral comments were received. (See "Comments Received Following Release of the Final EIS" discussion below.)

ALTERNATIVES CONSIDERED

Three action alternatives and a "No Action Alternative" were analyzed in the *Fort Baker Plan Environmental Impact Statement* (EIS). The action alternatives analyzed in the EIS were developed and refined through a three-year public planning and environmental review process and include; the Proposed Action, the 1980 GMP Alternative, and the Office and Cultural Center Alternative. Each alternative is summarized below.

The **Proposed Action** envisions preservation of historic structures and natural features of the site through selection of compatible uses and rehabilitation, restoration and other site improvements. A retreat and conference center would be created in the historic buildings around the parade ground and in the adjacent nonhistoric Capehart area. A program element would be developed to create a distinct identity for the retreat and conference center, and to strengthen the relationship of uses of the center's facilities to National Park purposes and the National Park mission. New compatibly designed construction would provide adequate space for meetings, dining and accommodations.

The Bay Area Discovery Museum would be retained and would expand into historic buildings and new, compatibly designed structures within its campus. The existing Coast Guard Station would also be retained, and could implement a modest expansion for meeting/training space or staff quarters.

The historic boat shop would be used as a public center with meeting and program space, and supporting visitor amenities. The marina would be converted to a public (non-membership-based) facility that accommodates up to 60 boats through a combination of moorings/slips for day or overnight use. Docks would be provided for the Coast Guard to use for mooring of disabled rescued boats, and for other NPS programs.

Restoration or enhancement of more than 40 acres of natural habitat, including habitat for the federally endangered mission blue butterfly would be implemented. The wooden bulkhead along the waterfront would be removed and the beach restored, with an adjoining 6 acres of meadow, a picnic area and boardwalk. Improvements to the fishing pier include the addition of fish-cleaning stations, railings and benches. The batteries and other fortification structures would be stabilized, preserved and interpreted (Battery Cavallo would be subject to a separate plan and environmental analysis). An NPS visitor center would be established and an interpretive trail would be created from Lime Point along the waterfront, continuing as the San Francisco Bay Trail to East Road, Battery Duncan and the chapel.

Other site-wide improvements included under the Proposed Action are:

- Improvements to hiking trails and bicycle routes.
- Rehabilitation of historic landscape features.
- Relocation of roads and parking away from the central waterfront and improvements to circulation routes, with sufficient unobtrusive parking around the site.
- Repair and replacement of utilities with sustainable systems that meet or exceed building and energy efficiency codes.

The 1980 General Management Plan (GMP) for the Golden Gate National Recreation Area is the basis for the **GMP Alternative**. This alternative would create a conference center to accommodate 350 people, a 200-bed youth hostel and an artists-in-residence program in the historic buildings around the parade ground. Twenty-three nonhistoric structures in the Capehart area would be removed and replaced with a 700-car parking lot for staging a shuttle to the Marin Headlands, and an NPS maintenance facility would be constructed. The Bay Area Discovery Museum and Coast Guard Station would be retained with no new construction or expansion. The historic boat shop and marina would be used in a similar way to the Proposed Action, with 50 slips provided for short-term public mooring. Treatment of the waterfront would be similar, however, a more urban landscape would be created. The fishing pier would be improved as in the Proposed Action. A ferry landing would be created at the pier. Historic fortifications would be preserved, and an environmental study and overnight campsite established near Battery Cavallo. An NPS visitor center would be established in a historic building, and roads and trails improved.

Under the **Office and Cultural Center Alternative**, the historic Parade Ground buildings would be used for offices, meeting and program space, and performance space and restaurant/food service space for private and nonprofit groups. Some nonhistoric residential structures would be used for park partner residences, and others would be removed to provide parking for the center. The Bay Area Discovery Museum and Coast Guard expansion would be the same as under the Proposed Action. The marina would be retained with both long-term and some short-term public mooring provided and public program and activity space provided in the boat shop. Treatment of

the waterfront, fishing pier, open space, natural habitats and historic fortifications would be the same as under the Proposed Action.

Under the **No Action Alternative**, the residential buildings in the parade ground and Capehart area would be leased or permitted as residences. Nonresidential structures would be stabilized for preservation with no new use. There would be minimal changes to the waterfront to provide for visitor safety, and no expansion of the Bay Area Discovery Museum or Coast Guard Station. The marina would be closed, the slips and docks removed, and the boat shop would be stabilized for preservation with no new use. Minimal preservation treatment of natural and cultural resources would be carried out to meet legislative requirements and to complete restoration efforts currently underway.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is defined as "...the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (*Forty Most Asked Questions Concerning Council on Environmental Quality's (CEQ) National Environmental Policy Act Regulations*).

The environmentally preferred alternative is the Proposed Action. Under the Proposed Action, the site's Historic District and character would be preserved, natural resources protected, existing habitat expanded, and the environmental effects associated with its use as a National Park site would be minimized. The EIS analyzed the Proposed Action's maximum environmental impacts, which included new uses and improvements to the site, including development of a 350-room retreat and conference center. Even under this "maximum scenario," the Proposed Action would generate less long-term environmental impact than the other action alternatives and would create the most environmentally beneficial effect overall, as described below. The Final EIS formalized the agency's commitment to solicit the smallest possible, economically feasible retreat and conference center proposal that meets the objectives of the project. However, for the purposes of this discussion, the maximum environmental impacts associated with a 350-room center are compared against the impacts of the other alternatives.

Under the No Action Alternative, minimal repairs to existing historic structures, infrastructure and other facilities would be implemented. Historic residential buildings would be leased for residential use and other historic buildings would remain vacant with minimal repair. No restoration of the cultural landscape or beach and waterfront area would be implemented. In addition, no new habitat restoration or enhancement for the federally endangered mission blue butterfly would be implemented. Although the effects of visitor use (traffic, air emissions, etc.) would be lower under the No Action Alternative, the benefits of the other "action" alternatives associated with habitat restoration, preservation and restoration of historic resources and the cultural landscape, recreational use and enjoyment by the American public, and beneficial visual effects would not occur.

Many of the environmental effects of the three action alternatives would be similar, with varying degrees of intensity. The 1980 General Management Plan (GMP) Alternative would have greater adverse effects on biological resources, recreation and visitor use, traffic and circulation, and air quality and noise than the other action alternatives. In comparison to the Proposed Action, the GMP Alternative would generate higher daily visitation, and daily vehicle trips would represent a 210% increase over the Proposed Action (and would require more than 1,600 parking spaces –

nearly double the amount needed under the Proposed Action). The Office and Cultural Center Alternative includes many of the same components as the Proposed Action, including treatment of the waterfront area, habitat restoration, and trails and open space. As a result, many of the environmental effects would be similar. Although some of the short-term construction effects associated with the Proposed Action would be avoided under the Office and Cultural Center Alternative, the latter would generate higher visitation and generate vehicle trips that would represent a 150% increase over the Proposed Action. As a result, the Office and Cultural Center Alternative would create greater long-term traffic and corresponding air quality and noise effects. The Office and Cultural Center Alternative would also be less preferable given the need for parking expansion (up to 1,300 spaces would be needed in comparison to the Proposed Action's maximum 895 spaces).

The Office and Cultural Center Alternative and the Proposed Action would be similar in their environmental effects, with the Proposed Action being environmentally preferred when considered on the whole. The Proposed Action provides the appropriate balance between protection and rehabilitation of the site's significant cultural and natural resources, and minimizes the long-term environmental effects associated with its use.

BASIS FOR DECISION

The National Park Service will implement the "Proposed Action" identified in the *Fort Baker Plan Final Environmental Impact Statement* issued in October 1999. The United States Department of Defense will transfer the remaining land under military ownership at Fort Baker to the National Park Service in 2001. The intent of the selected action is to transform Fort Baker from a military installation to a new unit of the National Park System through selection of a series of actions consistent with the National Park mission.

During the planning process for the project, the National Park Service, working with the public, established goals and objectives that were used as a framework for evaluating potential new uses and site improvements at Fort Baker. The goals and objectives were developed based on National Park Service policy guidance, the 1980 General Management Plan, public input, current knowledge about the site, and an understanding of Fort Baker's national park qualities. The project objectives are presented in the Purpose and Need (Section 1.3) of the EIS, and address the following goals:

- Promote the National Park Mission
- Achieve Sustainability
- Retain and Relate to the Site's Special Qualities
- Promote Public Access
- Minimize Environmental Impacts
- Retain and Complement Permanent Site Tenants and Other GGNRA Sites and Programs

The basis for the decision to adopt the "Proposed Action" is its ability to successfully fulfill the goals and objectives of the project. The Proposed Action provides the most desirable combination of promoting the National Park mission and public use, while preserving the site's resources and contemplative atmosphere and minimizing environmental effects including traffic.

The selected action will preserve and significantly enhance Fort Baker's cultural, natural, scenic and recreational values and minimize environmental impacts. This is accomplished by the following:

- Preservation of the historic buildings through selection of compatible public uses that have the ability to fund their necessary rehabilitation and long-term preservation and which will preserve the character of the site;
- Rehabilitation of historic landscapes that contribute to the National Register Historic District;
- Control of new construction to assure compatibility with the Historic District, and fit within the capacity of the site;
- Removal of roads and parking from the central waterfront and parking adjacent to the historic parade ground to create a pedestrian-oriented zone and restore the visual connection between these two areas;
- Confining new construction to the existing developed and previously disturbed areas of the site;
- Restoration or enhancement of more than 40 acres of natural habitat, including a beach and 20 acres of habitat for the federally endangered mission blue butterfly;
- Preservation of the site's open space, shoreline and natural habitats which comprise 85% of the site's 335 acres;
- Preservation and enhancement of appropriate public uses including fishing, boating, hiking and scenic viewing;
- Preservation and enhancement of existing park partner programs of the US Coast Guard and Bay Area Discovery Museum, and expansion of the Discovery Museum's program through new construction within its campus;
- Establishment of a program institute to create retreat and conference center programs that relate to the NPS mission;
- Visitor education and involvement through NPS interpretive and stewardship programs, visitor center and interpretative signing and exhibits;
- Incorporation of principles of sustainability in design, construction and operation of the site; and
- Mitigation requirements to avoid or minimize environmental impacts associated with new uses, including the reduction of traffic and the protection of natural and cultural resources.

MEASURES TO MINIMIZE HARM

The National Park Service has identified the known practicable mitigation measures to avoid or minimize the environmental effects of the Proposed Action. In response to public input on the Draft EIS, additional measures were developed and existing mitigation measures were refined to

be more stringent in the Final EIS. One of the new mitigation measures relates to the size of the proposed retreat and conference center component of the Proposed Action. The Final EIS was modified to include a mitigation measure that formalizes the National Park Service commitment to seek the smallest possible, economically feasible retreat and conference center proposal that meets the project objectives. The National Park Service is committed to working towards that goal, and with the public throughout project implementation.

The Proposed Action is anticipated to have minor to moderate effects (direct, indirect and cumulative). An unavoidable adverse effect to the existing military yacht club members, who will be displaced as a result of the conversion of the marina to a public facility, cannot be avoided by the Proposed Action. In total, more than 70 mitigation measures have been identified and are included in the Final EIS. Additional mitigation measures were incorporated into the Final EIS as recommended by the public or other agencies, or were developed by the NPS in response to issues of local concern, and were added in the Final EIS. The full text of the Final EIS mitigation measures (Section 2.6) is hereby incorporated by reference and is appended to this Record of Decision (see **Appendix A**).

Consistent with, and expanding on the mitigation measures described in Appendix A, the National Park Service is committed to looking for and implementing innovative approaches to reduce long-term dependence on automobile use at Fort Baker. This will be done working cooperatively with other agencies to seek regional solutions to transportation challenges in the areas surrounding Fort Baker, to engage in studies to reduce or eliminate uncontrolled automobile traffic within Fort Baker, and to further reduce parking at Fort Baker. The NPS is specifically committed to working with the City of Sausalito, Marin County Congestion Management Agency, the Golden Gate Bridge, Highway and Transportation District, Caltrans and the Metropolitan Transportation Commission.

AMENDMENTS/CORRECTIONS TO THE FINAL EIS

The following is a list of minor corrections or other revisions to the Final EIS, including several changes that were made in response to public comment. None of these revisions would affect the outcome of the environmental analysis provided in the EIS or materially change the selected alternative. Upon approval of this Record of Decision, these changes are incorporated by reference into the Final EIS.

VOLUME I:

Section 2.6.1 (Grading, Infrastructure Facilities and Building Foundations, page 2-24)

The mitigation measure related to code requirements for upgrading substandard buildings did not account for consistency with the Secretary of the Interior's Standards for Historic Structures. The text is amended by approval of the ROD, as follows: "All substandard buildings would be upgraded over time, and new construction would meet applicable seismic codes, laws and NPS policies. These include the 1997 Uniform Building Code (or more recent), the 1998 California Building Code (or more recent), the California State Historic Building Code (where application of more stringent code would create an adverse effect under Section 106 of the National Historic Preservation Act), and Seismic Retrofit Laws."

Section 2.6.3 (Water Resources Mitigation, page 2-25)

There was an error in the terminology used in the first mitigation measure in this section. The title of the measure and subsequent use of the following term is revised as shown: "Stormwater

Pollution Prevention Plan” (SWPPP) should be revised to read “Stormwater Management Plan.” As a point of clarification, SWPPPs are already a requirement of the Final EIS as described in Section 2.6.1.

Section 2.6.4 (Biological Resources Mitigation, page 2-29)

Marine Mammals/Seabirds/Waterbirds. This measure is corrected as follows: “The NPS would provide interpretive signage, markers and other materials to inform boaters and other visitors of access restrictions and other appropriate actions to prevent disturbance to marine mammals, wintering waterbirds and nesting seabirds, including waterbirds offshore and nesting seabirds on the Needles near Lime Point. Prior to reopening of the trail to Lime Point, a survey of current bird use of the Needles and Lime Rock would be completed to determine if additional mitigation to avoid disturbance of birds either nesting or resting on the rocks would be necessary. In addition, ongoing monitoring of marine mammal and waterbird activities would continue to document seasonal numbers and distribution of these species, and identify areas where recreational boating restrictions may be implemented. Signage would be provided at the dock and other locations, and maps provided at the marina to clearly identify restricted areas to boaters. Restricted use of identified areas would be enforced by on-site National Park Service law enforcement staff.”

Section 2.6.6 (Traffic and Circulation Mitigation, page 2-32 and 2-34)

Pedestrian/Bicycle Improvements. The following sentence will be included as an additional measure at the end of this discussion. “The NPS would provide safety information to bicyclists at Fort Baker and implement bicycle rental restrictions to minimize exposure of bicyclists to existing off-site hazards.”

Transportation Systems Management. The first bullet item shown under “Transportation Systems Management” is revised as shown: “Conzelman Road would be opened to one-way outbound vehicular traffic during peak traffic conditions...”

Chapter 4 – Table 4-1 (Impact Summary Table)

Editorial errors in Table 4-1 indicating that “no new construction” would occur under the Office and Cultural Center Alternative are corrected. As described in Chapter 2 (description of alternatives), new construction would occur under this alternative. This construction would be associated with expansion of the USCG facilities, BADM facilities, and potential removal of Capehart housing units to provide additional parking spaces needed for this alternative. The impact analysis provided in Chapter 4 for this alternative correctly reflects that construction would occur under the Office and Cultural Center Alternative, and the only change needed is to the impact summary table.

Appendix A, Table A-1 (page A-1)

Structure # 415 Mine Wharf (fishing pier) is designated in Table A-1 as “RM” = Remove. This is a typographical error that is corrected by revising the proposed treatment to “RH” = Rehabilitate and Reuse

COMMENTS RECEIVED FOLLOWING RELEASE OF THE FINAL EIS

The Fort Baker Plan Final Environmental Impact Statement was released on October 15, 1999, when more than 200 copies of the document were distributed to other agencies and interested members of the public. Copies were made available in paper and electronic format and the Final EIS was posted on the park's web site. The Environmental Protection Agency published a notice of filing for the Final EIS in the November 5, 1999 *Federal Register*, marking the beginning of the required 30-day no action period. The 30-day no action period closed on December 5, 1999. Oral and written comments on the project and Final EIS were received by the National Park Service during and after the close of the 30-day no action period. The National Park Service considered all comments, and a summary of the issues raised is provided below.

Written Comments

During the 30-day no action period, ten letters and 15 e-mail messages were received. The letters were from 5 individuals and 5 organizations, including National Parks and Conservation Association, National Trust for Historic Preservation, San Francisco Bay Conservation and Development Commission, City of Sausalito and Sausalito-Marin City Sanitary District. The letters generally focused on opinions regarding the Proposed Action (support or opposition). Seven of the letters were in general support of the public planning process and/or the Proposed Action. The San Francisco Bay Conservation and Development Commission submitted a letter acknowledging that the Plan appears consistent with the San Francisco Bay Plan. The City of Sausalito submitted a letter detailing their concerns with potential impacts of the proposed plan and raised questions related to NEPA issues (see discussion below). The local sanitary district letter concurred with the Final EIS analysis and conclusions regarding wastewater capacity but requested that the existing agreement for these services at Fort Baker, and the National Park Service right to use such services, be revisited. The National Park Service has responded to this request and is working with the sanitary district to resolve these issues. The e-mail messages primarily expressed opposition to the retreat and conference center component of the plan, concern related to the size of the retreat and conference center or issues that are not relevant to the National Environmental Policy Act. One message addressed concern related to bicycle safety, which was also addressed in the City of Sausalito letter, and is responded to below. Post cards in support of and in opposition to the Proposed Action were also received during the 30-day no action period.

The primary NEPA issues raised in the City of Sausalito letter relate to the traffic impact methodology and subsequent results of that analysis as presented in the EIS. No new information has been submitted which would change the analysis or conclusions presented in the Final EIS. In response to the City of Sausalito letter, the National Park Service is clarifying the text of a traffic mitigation measure as described above, and has also added an additional measure related to off-site bicycle safety. A comprehensive response to all NEPA-related issues raised in the City of Sausalito letter has been provided in **Appendix B** of this Record of Decision. Consistent with and expanding on the mitigation measures in Appendix A, the NPS is also pursuing further transportation planning, both on its own, and in partnership with the City of Sausalito. The NPS will invite the cooperation of all affected entities in doing so.

Oral Comments

During the November 16, 1999 Golden Gate National Recreation Area Advisory Commission public meeting, 28 people provided oral comments. Of the total, 20 people spoke in favor of the plan and the public planning process used by the National Park Service to develop the Plan and refine the EIS. Speakers included individuals and representatives of organizations including the

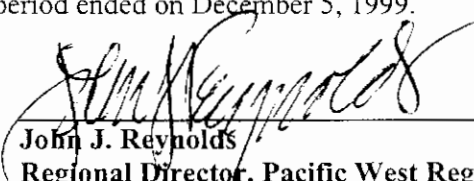
National Parks and Conservation Association, the National Trust for Historic Preservation, Marin Heritage, and the Bay Area Discovery Museum. Six people, including the chair of the Sausalito Citizens' Task Force for Fort Baker, stated their opposition to the retreat and conference center component of the Plan, and expressed concerns related to traffic and the potential effect of the Plan on the character of the site and its resources. One individual questioned the ownership of the land at Fort Baker, and stated that she was unable to find documentation confirming United States Army ownership. One representative of the Tomales Bay Association stated support for the development of a youth hostel (included in the GMP Alternative).

Following the close of the 30-day no action period, the National Park Service received additional postcards and e-mail messages similar to those described above, as well as additional letters. These included letters from Marin Audubon Society, San Francisco Bicycle Coalition, Marin County Bicycle Coalition, Resource Renewal Institute, City of Sausalito, Town of Ross, Town of Tiburon, City of Mill Valley, City of San Rafael, Town of Fairfax, Bay Area Discovery Museum, Marin County Board of Supervisors, Ecumenical Association for Housing, and The Aspen Institute, in addition to letters from individuals. These letters were reviewed and considered by the National Park Service. No new NEPA issues or questions were raised that require response in this Record of Decision or modification to the Final EIS, and these letters did not provide information that would lead to the selection of other alternatives or change the determination that the Proposed Action is the environmentally preferred alternative. The NPS is committed to working with these respondents, as with all interested parties, during implementation of the project, following approval of the Record of Decision.

CONCLUSION

The above factors and consideration warrant adopting the final Fort Baker Plan (identified as the Proposed Action in the Draft and Final EIS) as the General Management Plan Amendment and Implementation Plan for Fort Baker. The Fort Baker Plan will not impair park resources or values, and, in fact, will significantly enhance the site's natural and cultural resources. The 30-day no action period ended on December 5, 1999.

APPROVED: _____


John J. Reynolds
Regional Director, Pacific West Region

DATE: _____

6/9/2002

APPENDIX A: FINAL EIS MITIGATION MEASURES, AS AMENDED

*Chapter 2 Excerpts - Fort Baker Plan Final Environmental Impact Statement
(October 1999, as amended)
From Final EIS pages 2-22 through 2-39*

2.6 MITIGATION MEASURES INCLUDED AS PART OF THE PROPOSED ACTION

As part of the Proposed Action, the NPS would implement the following mitigation measures. These measures represent modifications of the Proposed Action that would minimize or avoid the environmental impacts of the project or create a beneficial effect. Measures are presented for all impacts which are considered potentially significant, as well as those that are not potentially significant but for which the NPS wishes to minimize the impact. A complete discussion of the environmental consequences of the Proposed Action is provided in Chapter 4 of this EIS. All measures would be regularly evaluated and monitored by the NPS to determine their effectiveness in reducing impacts. Several measures presented in this section would require the approval and/or participation of other agencies. Such measures are clearly identified in the text below and in Chapter 4, and are in addition to those needed to reduce the Proposed Action's effects to a less-than-significant level. The NPS, as Lead Agency, will have primary and full responsibility for coordinating the specific elements of each mitigation measure, including those that involve cooperation or approval of other agencies. The NPS also would be responsible for ensuring that each mitigation measure has been implemented as specified in this document.

2.6.1 Geology and Soils

Soil Erosion. Stormwater pollution prevention plans (SWPPP) that prescribe best management practices (BMPs) to minimize potential soil erosion, and include prescriptions for monitoring of conditions before and after the completion of work (and for immediate post-restoration site stabilization) would be prepared and implemented. The SWPPP could include standard measures such as the following:

- Restrict grading and vegetative cover removal to the dry season between May 1 and November 15. This measure would generally preclude rainfall runoff from causing erosion of bare soils in disturbed areas.
- Seed exposed bare soil, apply appropriate soil amendments, and sprinkle irrigate if necessary to encourage establishment of a self-sustaining vegetative cover as soon as practical after grading or other soil disturbance are completed. Irrigation should continue until natural rainfall sustains the vegetation.
- Minimize soil disturbances by restricting heavy equipment, trucks and vehicles to the immediate construction area.
- Use soil tackifiers, jute netting, hydroseeding, or other effective measures to retard erosion on steep slopes (over 10% gradient). These sites would be monitored on a weekly basis until a vegetation cover of 90% is minimally established. If rills or gullies form, corrective actions would be taken to retard erosion.
- Install temporary/permanent water bars on trails and slope exposures which are difficult to vegetate or that would be subject to long-term soil compaction.

Mitigation Measures Included as Part of the Proposed Action

- Use straw bales and silt fences to retard movement of loose soil at disturbed sites. Excessive silt deposition in drainage swales, channels and culverts would be removed mechanically at the end of the construction period and repeated as necessary for a minimum of one year.
- Where appropriate, the tires of trucks and heavy equipment leaving the site would be washed or brushed off mechanically to reduce soil deposition on roads.
- The SWPPP would include specific mitigation measures for each construction site over ¼ acre. The SWPPP would be compatible with other objectives of the Proposed Action. For example, vegetation in the habitat restoration area would use plant species that support the restoration objectives.
- The implementation of the SWPPP would be monitored by the NPS to ensure compliance with all stipulations, mitigation measures and performance standards identified in the SWPPP. If the NPS uses contractors for construction, the NPS would incorporate into contract specifications the requirement that contractor will comply with and implement the provisions of the SWPPP for erosion control noted above, as well as other measures to protect water quality.

Additional BMPs, if necessary, would be implemented based on monitoring. (Also refer to Section 2.6.3.

Changes in Shoreline Configuration. Removal of the bulkhead and restoration of the beach would be designed to provide protection for adjacent structures which would remain (U.S. Coast Guard and historic boat shop). Protective measures would be specified by the project engineer and may include installation of temporary or permanent shoring around the foundation of each structure, temporary dewatering and use of physical devices to prevent settlement in the foundation of each structure. Seasonal monitoring of the restored beach would be conducted to verify its stability. Extension of protective structures would be implemented by the NPS, if needed based on monitoring. As mitigation, a temporary barrier would be installed at the low water line to prevent erosion of exposed soils during the restoration effort. The barrier would be permeable to allow water flow through it, but it would retard wave erosion, and would hold back sediment and soil and prevent its deposition in Horseshoe Bay. Also refer to Section 2.6.2 for additional information.

Landslides. Detailed design-level landslide geotechnical engineering investigations would be performed by a licensed geotechnical engineer to confirm the characteristics and extent of landslides that pose potential hazards to the areas to be developed. These investigations would provide site-specific evaluation of the stability of these landslides with respect to proposed grading. The studies would be used to develop and implement design criteria for the stabilization of landslides as required to reduce the hazards to existing and proposed developments to an acceptable level of risk. Design-level geotechnical investigation would include: subsurface exploration to characterize the thickness of landslide deposits, obtain samples for testing, and obtain groundwater level information; laboratory testing of geologic materials; slope stability analysis, including hazards under seismic ground shaking conditions; and development of stabilization/repair recommendations. For these areas, required and recommended slope stabilization measures may include slope benching, buttresses, retaining walls, installation of drainage features and excavation and reworking of the landslide materials. The project's engineering geologist would specify performance standards to achieve acceptable level of risk. The project's engineering geologist would establish requirements and make recommendations to the NPS prior to the development of specific construction plans. The NPS would either

implement the measures to reduce the hazard to an acceptable level of risk or select an alternative course of action, such as avoidance of construction of the proposed facilities in an area subject to high risk

Grading, Infrastructure Facilities and Building Foundations. Prior to NPS approval of a specific development construction plan, detailed design-level geotechnical engineering investigations would be performed to develop appropriate geotechnical engineering design criteria for grading, infrastructure facilities, and building foundations for individual projects implementing the Plan. The scope of these investigations would include site-specific subsurface testing, laboratory testing, and geologic/engineering analyses that address specific geologic conditions, constraints on development, and performance standards. In conformance with code requirements, the NPS would undertake a structural safety evaluation of all buildings on the project site to be used for human occupancy and use. All substandard buildings would be upgraded over time and new construction would meet applicable seismic codes, laws and NPS policies. These include the 1997 Uniform Building Code (or more recent), the 1998 California Building Code (or more recent), [California State Historic Building Code \(where application of more stringent code would create an adverse effect under Section 106 of the National Historic Preservation Act\)](#), and Seismic Retrofit laws. In areas underlain by soft Quaternary Sediments, custom earthquake ground motion estimation would be used for design of new structures and retrofitting of existing structures to meet current performance standards. The report will specify structural design recommendations and materials. The NPS would incorporate the recommendations of the engineering geologist/structural engineer into the design and construction of the buildings/facilities. As required by law, the buildings would be inspected during their construction and retrofitting to ensure that the standards are met. As recommended by the California Division of Mines and Geology, Special Publication 117: *Guidelines for Evaluating and Mitigating Seismic Hazard Conditions in California* would be used in preparation of such design.

2.6.2 Coastal Processes

Shorefront Stabilization. Native plant species would be planted in the graded area adjacent to the new beach no later than 120 days after grading is completed to prevent the contours from eroding while natural vegetation becomes established. If the grading occurs after the winter months, temporary irrigation would be provided to support plant establishment. A boardwalk would be constructed across the beach to buffer vegetation from increased foot traffic and minimize visitor disturbance. Please also see Section 2.6.1.

Removal of Bulkhead Timbers. Handling and disposal of creosote-coated timber would be conducted in accordance with state regulatory standards.

2.6.3 Water Resources

[Stormwater Management Plan](#). NPS would develop and implement a stormwater [management plan \(SMP\)](#) that prescribes best management practices (BMPs) and compliance monitoring to control erosion and contaminated runoff from the site, including structural, management, and vegetation measures. Measures similar to those presented in the *Presidio of San Francisco Stormwater Management Plan* (May 1994) and the *State of California Best Management Practices Handbook: Construction Activity* (prepared for the State Water Resources Control Board, March 1993) would be implemented. Examples of such BMPs included use of sediment trapping and filtering systems, bioswales, storm drain inlet protection, sediment basins, and other such BMPs. Refer to Section 2.6.1 for additional detail.

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Public Education. In addition to the positive structural actions to improve water quality, the NPS would provide educational programs (e.g., stenciling of storm drains, prohibition of discharge of boat wastes) to increase knowledge and understanding of the importance of water quality to the health of the environment to prevent and/or minimize inadvertent water pollution.

Water Quality Protection and Monitoring. Periodic monitoring of urban and stormwater runoff would be conducted. Appropriate monitoring protocols would identify parameters and maximum levels allowed. If these levels are exceeded, water quality improvement features such as additional BMPs previously described would be implemented by the NPS.

Dredging Requirements. The following measures would be implemented for any proposed future dredging operation at Fort Baker to protect natural resources. These measures would be implemented in addition to the existing resource protection requirements of relevant regulatory agencies, including but not limited to the US Army Corps of Engineers, State Water Resources Control Board, Regional Water Quality Control Board, Environmental Protection Agency, and the State Lands Commission.

The NPS would require the future operator of the marina to consult with the NPS (Division of Resource Management and Planning) to determine the specific location and total volume of material proposed for removal within Horseshoe Bay. All dredging operations would be subject to the following measures prior to submitting necessary permit applications to other (outside) agencies. The NPS would also work with the Coast Guard to implement the following.

- the need for dredging must be specifically demonstrated;
- the total volume of material proposed for removal would be reduced to the maximum extent feasible;
- dredging operations would be restricted to the months of June-September;
- important fisheries and natural resources would be protected; and
- proposed dredging operations must demonstrate consistency with the Long Term Management Strategy (LTMS) program and the Bay Conservation and Development Commission's (BCDC) policies regarding dredging, including consideration of dredging need, beneficial reuse, and upland disposal site alternatives.

In addition to demonstrating the above, the NPS would require the following priorities be used in determining disposal methods for dredged material from Fort Baker:

- the first priority for disposal of dredged material would be beneficial reuse on-site. If not deemed feasible based on the tested quality of material and/or lack of on-site demand for reuse, then;
- beneficial reuse at alternative off-site location would be considered. If the tested quality is not consistent with standards for available off-site opportunities and/or if no demand for such materials exists at the time of disposal, then;
- material would be disposed of at the site currently authorized/designated disposal site. Non-tidal sites would be used to the maximum extent feasible.

2.6.4 Biological Resources

Threatened, Endangered, Rare, and Sensitive Species. The NPS has consulted with the USFWS and NMFS regarding potential effects to listed species. This Final EIS has been revised to incorporate the recommendations, terms, and conditions provided by these agencies to protect listed species.

Control of Visitor Use. Sensitive habitats, including native plant communities/habitats, mission blue butterfly habitat, steep or eroded soils, and areas identified for habitat restoration would be protected by identification and closure of social trails, careful location of new trails and the use of protective fencing, interpretive and enforcement signing, and educational materials/programs. The following measures would be implemented:

- Post and cable or other appropriate barrier fencing would be used in locations where hikers would be likely to leave the trail with potential to damage adjacent mission blue butterfly habitat. Appropriate buffer zones would be established to further protect mission blue butterfly habitat.
- Barrier fencing or vegetation would be installed at the rear of the conference center lodging to prevent visitors from taking shortcuts through habitat to reach trails and open space.
- An existing trail and all social trails through mission blue butterfly habitat would be closed and the site restored, and a new trail would be constructed to provide a loop trail experience for visitors using the Barrier Duncan Trail. This would discourage off-trail use by providing an attractive alternative route.
- Monitoring of off-trail use and the effectiveness of planned protective measures would determine the need for additional actions or increased educational and enforcement actions.
- Sensitive areas along the proposed San Francisco Bay Trail, including mission blue butterfly habitat, nesting/roosting seabird areas, and steep slopes would be protected by trail alignment, interpretive signs, fencing, and where appropriate, patrols.

Also see Section 2.6.9 (Recreation and Visitor Enjoyment) for additional measures related to visitor use.

Mission Blue Butterfly Habitat Restoration. Planned restoration of mission blue butterfly habitat as mitigation for the Golden Gate Bridge seismic retrofit work would continue to be implemented at Fort Baker. Future restoration efforts identified as part of the Proposed Action would expand on this project, completing up to 23 acres of additional butterfly habitat restoration onsite. The NPS would develop assurances that the mission blue habitat restoration, enhancement, and maintenance takes place in a timely manner as proposed by ensuring that funding would be available for these efforts. The NPS would provide a description of these assurances to the USFWS for review and approval before November 1, 1999, consistent with the terms and conditions of the USFWS's Biological Opinion for the project (signed September 29, 1999).

Mission Blue Butterfly Management and Monitoring Strategies. The NPS would carry out a protocol for monitoring visitor-associated impacts to the mission blue, its host plants and habitats, including unauthorized trail formation. Habitat enhancement areas not specifically targeted for the mission blue would also be monitored for establishment of host plants, mission blue populations, and visitor impacts. The results of this monitoring would be reported to the USFWS in an annual report.

Temporary Disturbance to Mission Blue Butterfly Habitat Areas. When construction or infrastructure repair is to take place near threatened, endangered, or other species of special

concern, a qualified biologist would monitor construction activities to ensure protective measures are implemented, and stop work if necessary to protect biological resources. The NPS would also enforce measures to avoid accidental habitat degradation during construction phases, including establishment of buffer areas (minimum 50 feet where possible), flagging *lupinus albifrons* in the vicinity of construction activity, installation of temporary fencing, dust control during construction, worker education, and posting and enforcing a 20 mph speed limit on Conzelman Road during the flight season.

Anti-Poacher Training. The NPS would train on-site workers and volunteers to detect and respond to suspicious activities characteristic of endangered butterfly poachers.

Anti-Poacher Patrols. The NPS would conduct daily, irregularly scheduled patrols of the plan area by law enforcement or uniformed park staff during the mission blue's vulnerable season (late March to early July) to detect, deter and prevent poaching. The NPS would document the number and results of patrols in the annual reports copied to the USFWS.

Control Invasive Plants in Developed Areas. Invasive non-native plants such as french broom, fennel, and eupatorium are currently found in developed areas of Fort Baker adjacent to existing and proposed mission blue habitat restoration areas, and provide a source of propagules that threatens these habitats. The NPS would control invasive plants within dispersal distance of natural habitats so that the integrity of the restored and enhanced areas may be preserved. These actions would be accomplished through implementation of an exotic plant management plan.

Control Non-Native Trees. The NPS would reduce the extent of non-native tree stands in the Fort Baker Plan area, outside of the developed and landscaped lands, to only the extent as seen in 1991. The focus would be on the trees encroaching on mission blue habitat and blocking connection between habitat at Battery Duncan and Battery Cavallo. The NPS would follow tree removal promptly with efforts to restore mission blue habitat in the cleared areas.

Ongoing Consultation. Before January 1, 2005, the NPS would review with USFWS the status of the Fort Baker Plan, the mission blue, and the success of the plan in minimizing impacts to the species. As a result of this review, USFWS will consider the extension or reinitiation of the biological opinion.

Monarch Butterfly. Monarch butterfly autumnal and overwintering sites would continue to be monitored, protected and interpreted. Restoration activities would avoid known monarch sites. Removal of eucalyptus groves which provide overwintering sites would be a separate action subject to additional environmental analysis.

Fisheries. Bulkhead/riprap removal, beach restoration, marina conversion, and future dredging activities shall occur during the months of June through September. Implementation of this measure is recommended by the National Marine Fisheries Service to minimize potential effects to special status species and habitat.

Eelgrass Beds. Mitigation for potential impacts to eelgrass would conform to the requirements set forth in the *Northern California Eelgrass Mitigation Policy* (as adopted July 31, 1991). In addition, the following measures would be implemented to protect and enhance eelgrass beds:

1. During construction: removing riprap through a land-based operation, timing of beach restoration to occur as much as possible during the period of plant dormancy, and removing riprap during low tide periods to minimize turbidity. Other mitigation such as silt fences and

relocating plants and associated animals to other areas of Horseshoe Bay during beach restoration would be considered.

2. During dredging: any dredging activities would avoid areas with eelgrass where feasible. Pre-project surveys would be required before implementation of any dredging.
3. Long-term operational: education, signs and restriction of boats from eelgrass zones; removal of large floating debris; prohibition of the use of herbicide and fertilizers on landscapes at Fort Baker during the winter and spring (November 1 to March 30) or requiring application procedures that would not result in runoff; as well as enhancements of the beds within the bay through selective removal of scattered riprap in the southeast corner.

Raptor Nests. Prior to any construction activities, NPS biologists would determine whether any birds of prey are nesting in the vicinity of proposed construction activities. Observations would be made during the breeding season (January through July) prior to and during construction activities. If nesting pairs are located in the work vicinity, appropriate buffer zones would be delineated by a qualified biologist and the area closed by installation of temporary fencing until the biologist has determined that nesting activity has ended. Other preventive measures, such as the use of signing, implementation of a monitoring program, and establishment of contingency plans, would also be implemented as necessary to avoid accidental habitat degradation during the construction phase.

Nesting/Migratory Birds. Any removal (including mowing and tree-trimming) of landscaped, nonnative or native vegetation would follow park guidelines for protection of nesting birds. These guidelines include restrictions on timing of vegetation removal, requirements for searching for active nests prior to removal, and maintaining mowed areas at low height to discourage nesting. Restrictions would also apply to cliff swallow nests on buildings. Bird exclusion measures, such as temporary netting, would also be considered for implementation prior to the start of nesting season. Such actions would be considered on a case-by-case basis by the NPS. Use of this measure could help reduce or avoid impacts to nesting birds during construction activities.

Marine Mammals/Seabirds/Waterbirds. The NPS would provide interpretive signage, [markers](#) and [other](#) materials to inform boaters and other visitors of [access restrictions and other](#) appropriate actions to prevent disturbance to marine mammals, wintering waterbirds and nesting seabirds, including waterbirds offshore and nesting seabirds on the Needles near Lime Point. Prior to reopening of the trail to Lime Point, a survey of current bird use of the Needles and Lime Rock would be completed to determine if additional mitigation to avoid disturbance of birds either nesting or resting on the rocks would be necessary. In addition, ongoing monitoring of marine mammal and waterbird activities would continue to document seasonal numbers and distribution of these species, [and identify areas where recreational boating restrictions may be implemented. Signage would be provided at the dock and other locations, and maps provided at the marina to clearly identify restricted areas to boaters. Restricted use of identified areas would be enforced by on-site National Park Service law enforcement staff.](#)

Vegetation Removal. Site-specific revegetation plans would be implemented for native plant communities that may be negatively affected by construction projects such as infrastructure improvements or building rehabilitation. Native plants that could be disturbed would be salvaged from the work areas prior to construction and transported to the Marin Headlands native plant nursery or stored onsite for restoration and mitigation sites. Revegetation of disturbed areas after construction or demolition would proceed as quickly as possible to reduce recolonization by invasive species. Any loss of native habitat due to construction projects would be fully mitigated

through restoration such that no net loss of native habitat is achieved. This may include eucalyptus tree and broom removal.

Signage and Educational Materials. Directional signs and trail signs, Fort Baker orientation maps and outdoor wayside exhibits would be appropriately placed to help direct and inform visitors to the site. Informational and enforcement signs similar to those used at other park sites would be installed that would warn users about activities that are disturbing to wildlife. Printed material would be provided in visitor contact areas such as the NPS visitor center, exhibit areas, in conference rooms, and at the boat ramp regarding the sensitivity of habitats and the need for visitor cooperation for their protection. Requirements would be included in agreements with existing or future park partners, such as the conference center operator and the BADM to provide educational materials at their facilities.

Bat Survey. Prior to any building removal or rehabilitation of abandoned or minimally occupied buildings, attic spaces, roofing or replacement of tile roofs, bat surveys would be performed to determine presence, species identification, roosting locations, type of roosting habitat (i.e., day, night, maternity, winter, etc.) and to document intensity of use. These surveys would be used to develop appropriate measures (consistent with the preservation of historic structures) to avoid or mitigate impacts. Regional bat experts would be consulted in the preparation of these measures.

Food, Litter and Pests. All park partners and concessionaires would be educated on and be required to implement the NPS Integrated Pest Management Policies. Visitors would have signs and information regarding the importance of litter control, not feeding wildlife and other pest management issues. Animal proof trash receptacles would be used. Fish-cleaning stations would be designed to be self-contained so that they do not leak/dump into the bay and such that odors and wildlife access are minimized.

Feral Cats. Feral cats are predators to native wildlife species. Any feral cats found at Fort Baker would be captured live and taken to nearby humane societies.

2.6.6 Cultural Resources

Memorandum of Agreement. A Memorandum of Agreement (MOA) between the State Historic Preservation Office (SHPO) and the NPS was developed to address the effects of the Proposed Action on all contributing elements to the Fort Baker historic property. When all signatures have been obtained, the Advisory Council on Historic Preservation (ACHP) will be notified and provided copies of the consultation documentation. All but twelve of the contributing structures at Fort Baker would be preserved and maintained under the MOA.

Programmatic Agreement (Interim Treatment). Until Fort Baker is transferred to the NPS, the U.S. Army will be the Lead Agency responsible for the preservation of the site's historic structures. These responsibilities are outlined in an existing Programmatic Agreement signed by the Army, SHPO, and the NPS in May 1996. The Programmatic Agreement identifies the Army's responsibility to preserve and maintain Fort Baker historic structures in a manner consistent with the policies and purposes of the National Historic Preservation Act and related regulations, standards and guidelines. The NPS would continue to work with the Army to insure that the commitments made in that agreement are carried out in the interval of time until transfer to the NPS.

Beach Restoration. Prior to excavation work, archeological testing would be conducted to identify archeological sites and develop a treatment plan for archeological resources. Treatment of archeological resources may require changes to the project design or intensive monitoring.

Rehabilitation of Buildings Surrounding the Parade Ground. Rehabilitation of the historic buildings surrounding the Parade Ground would be compatible with the qualities that currently qualify each structure for inclusion in the National Register of Historic Places. Care would be taken to retain character-defining features of the buildings: those distinctive aspects, qualities or characteristics that contribute significantly to their physical character. These include form, structure, materials, particular features such as roofs, windows, entrances and porches, interior spaces and finishes, and mechanical and electrical systems. Accessibility would be a particular consideration, as most buildings at Fort Baker do not comply with current standards. The NPS requires that full program accessibility be achieved as part of the rehabilitation process. In adapting the buildings to new uses, encouragement would be given to reconstructing the porches that previously existed on buildings 601, 602 and 636.

New Construction. New construction at Fort Baker would be designed in a manner that is compatible with but clearly differentiated from buildings of the historic district. Design direction would be guided by compatibility criteria based upon character-defining elements of the historic district. Scale, texture, color, rhythm of openings, massing, and materials would be some of the elements of the compatibility criteria that would help provide continuity between the new construction and its historic surroundings. It is expected that new designs would neither be abject repeats of historic style nor isolated statements without reference to the history within which they rest.

Increased Security and Protection Measures for Batteries. The NPS would employ the most effective concepts, techniques, and equipment to protect the existing batteries at Fort Baker against vandalism, graffiti, and other threats without compromising their integrity or unduly limiting their appreciation by the public.

Battery Cavallo Preservation and Interpretation Plan. In a future planning effort with separate environmental analysis, the NPS would develop a detailed multidisciplinary plan for the preservation and interpretation of Battery Cavallo, integrating requirements for historic preservation, natural resource protection, visitor use and interpretation.

Archaeological Resources. Documentary research and test excavations would be conducted in areas of high archaeological sensitivity to assist in identifying, evaluating and avoiding significant remains at these sites during plan implementation. Unexpected discoveries may occur outside of these areas, and routine archaeological clearances would be conducted for all areas within Fort Baker. An archaeological monitoring program designed in accordance with the MOA would be used to evaluate and record historic features that may be discovered during the Proposed Action, as noted above.

Native American Consultation. Communication has been initiated by the NPS with the Federated Indians of Graton Rancheria. The NPS will consult with the Tribe to develop an agreement for the treatment of prehistoric sites or burials in the Fort Baker planning area. The first priority will be to conduct a testing program in the vicinity of prehistoric sensitivity areas identified within the *Fort Baker Cultural Landscape Report*. The NPS would then seek to preserve in place such resources.

2.6.7 Traffic and Circulation

Traffic Management Plan. Prior to construction, a Traffic Management Plan would be prepared by the contractor(s) and submitted to the NPS for review and approval. The plan will include specifications on construction traffic scheduling, proposed haul routes, construction parking, staging area management, visitor safety, detour routes, and speed controls (including those

addressed in Section 2.6.4 for the mission blue butterfly). The contractor(s) will limit the transport of construction equipment and materials to periods of off-peak traffic to the maximum extent feasible. If not deemed feasible by the construction contractor, the NPS would condition the plan to require additional measures to ensure that the traffic effects evaluated in the EIS are not exceeded. Such measures might include requirements to stagger worker shifts and material deliveries, and/or provide traffic control officers during construction to help speed the flow of traffic and enhance traffic safety. Provision of traffic control officers would be reviewed with Golden Gate Bridge Highway and Transportation District (GGBHTD), California Department of Transportation (Caltrans) and other relevant agencies to ensure coordination with their operations and assure that proper permits are received and qualified personnel employed. Modifications, if any, to the Traffic Management Plan would be subject to written approval by the NPS. A copy of the draft plan would be made available for review and comment to other agencies upon request.

Onsite Vehicle Access and Circulation. To improve onsite circulation, the following would be implemented:

- To avoid confusion to drivers arriving at Fort Baker, channelization/signage would be provided at key points within Fort Baker (Bunker Road and East Road, and intersections with Alexander Avenue at Danes Drive and East Road). Drivers/vehicles would be directed to their destinations and/or available parking locations. Signs directing Highway 101-bound motorists to use Bunker Road/Danes Drive/Alexander Avenue would be installed.
- Danes Drive/Bunker Road – NPS proposes to lengthen the westbound right-turn lane from Danes Road to Bunker Road by a minimum of 75 feet. In the event of a queue extending east of the Baker-Barry tunnel, this improvement would allow vehicles destined for Fort Baker to safely bypass, and avoid contributing to the queue.
- To allow for adequate access and egress for emergency and service vehicles, on-street parking would be regulated and enforced. On-street parking would also be prohibited on Murray Circle around the Parade Ground.
- Provision of overflow parking along East Road on existing paved/graveled surfaces (with shuttle service provided to special event sites as appropriate depending on the scale of the event).
- At mid-block locations on East Road or intersections near the BADM, median pedestrian refuges would be installed to facilitate pedestrian crossings. These could also be designed as raised crosswalks to improve their visibility. “Traffic calming” features intended to reduce the speed of vehicular traffic could also be installed in this area. Such measures may include reducing lane widths, lowering speed limits, addition of stop signs and/or advance pedestrian crosswalk signs, pedestrian refuge areas, raised medians, and other techniques to improve the safety of visitors and reduce the speed of cars.
- NPS would work with Fort Baker park partners to provide an onsite shuttle service for travel locations between parking and onsite facilities, as appropriate.

Pedestrian/Bicycle Improvements. Bicycle/pedestrian link routes or pathways would be provided between the proposed land uses and connected to the existing Bay Trail. Vehicular traffic except for emergency and service vehicles, and potentially one-way outbound traffic during peak traffic conditions (as described under the TSM below), would be prohibited on Conzelman Road. Signs warning hikers and bicyclists of possible intermittent vehicles would be posted for safety reasons. Secure bicycle parking facilities would be provided by all Fort Baker tenants. In addition, the shuttle system required under the TDM program to and from Fort Baker and Sausalito would

accommodate bicycles to help bypass the constrained areas of Alexander Avenue, Second Street and Bridgeway. Also see Offsite Transportation Enhancement below for a description of regional efforts. [The NPS would provide safety information to bicyclists at Fort Baker and implement bicycle rental restrictions to minimize exposure of bicyclists to existing off-site hazards.](#)

Transit. The NPS would pursue the provision of direct transit service to Fort Baker by initiating consultation with Golden Gate Transit, the Marin County Transit District and MUNI to determine the feasibility and cost of such service. The NPS would also coordinate with public transit officials and tour companies to determine where standard or other-sized buses can be accommodated given the road geometry of Fort Baker.

Size of Conference and Retreat Center. When selecting the developer and operator for the proposed conference and retreat center component of the Proposed Action, the NPS would establish competitive selection criteria to solicit the smallest possible economically feasible facility that meets the objectives of the project including minimizing impacts on the site and its surroundings.

Transportation Demand Management Program. Under the direction and coordination of the NPS, a Transportation Demand Management Program (TDM) would be developed and implemented for Fort Baker. The focus of the TDM will be to reduce automobile use and parking requirements, alleviate traffic congestion, and enhance transportation safety. Each park partner including the future operator of the conference and retreat center would be required to prepare individual TDM plans which would be integrated into an overall program for the site. Oversight of the development and implementation of the TDM would be done by the NPS, in consultation with relevant agencies, and in conjunction with the Monitoring Program proposed by the NPS as described later in this section.

The TDM measures listed below are presented under two primary categories: those that “would” be implemented (i.e., those measures which have been identified to address and mitigate the traffic impacts identified in the EIS); and those that “could” be implemented in the future (i.e., additional measures that would be considered by the NPS in the future based on the results of ongoing monitoring).

The measures that would be included in the Fort Baker TDM program include:

- A site manager or other NPS designee would be assigned the responsibility for oversight and management of the TDM. The duties of the site manager would include, but not be limited to: working with park partners to develop and ensure implementation of TDM, oversight of construction activities to ensure compliance with the approved Traffic Management Plan, conduct review of park permits for special events, and function as the point of contact for potential traffic concerns.
- Provision of shuttle service appropriate to the scale of the approved facility. The shuttle service would include airport connections, local attractions (including sites within the GGNRA and the City of Sausalito) and service to local transportation nodes (such as the Sausalito ferry dock) by the operator of the conference and retreat center with coordination and cost-sharing with other Fort Baker park partners. This service would be actively promoted and advertised to conference and retreat center participants in advance of their trip. Shuttle service would be shared by the BADM, Coast Guard and the NPS. Convenient and regularly scheduled shuttles to and from the City of Sausalito would be provided for patrons of Fort Baker, and would be designed to accommodate bicyclists.

- Promoting alternative travel modes by providing reduced or free fares or other incentives to use transit or a shuttle connection, as well implementation of a ridesharing program. Informational packets describing available services would be provided to employees and visitors.
- Require that all large events secure a park permit as part of the approval process. The TDM would establish the criteria used to define a “large” event, as well as the procedure used by park partners to secure such a permit. As part of the permit approval process, the NPS may condition a permit to require implementation of the Transportation System Management (TSM) measures presented below or other restrictions specific to the proposed event that the NPS identifies as necessary to minimize traffic effects. Scheduling of all large events would be coordinated with other site users and the City of Sausalito, where relevant.
- Require that the conference and retreat center TDM plan include measures specifically aimed at reducing peak hour trips as well as an overall reduction in single vehicle trips to the site including:
 - staggering employee work shifts to avoid peak hours,
 - schedule check-in and check-out times to avoid peak traffic hours,
 - provide future patrons of the conference and retreat center with information on how to get to Fort Baker without a car before their arrival,
 - upon arrival to the center, educate patrons about congestion on the Golden Gate Bridge and congestion and limited parking in downtown Sausalito and provide information on alternative means of transportation including shuttle system.
- Work closely with BADM to identify measures to reduce total number of trips and parking demands including: working with participating schools for students to arrive to the BADM via bus or carpool; spread out BADM event schedules throughout the day and thereby decrease simultaneous parking demand; and other incentives to reduce automobile trips.

Other measures that could be implemented as part of Fort Baker’s TDM include:

- Implement limitations on programs offered and scheduling of large events.
- Use conference and retreat center parking fees to further discourage individual vehicle trips to Fort Baker.

Bay Area Discovery Museum. Phase the proposed BADM expansion such that the TDM is in place for each phase prior to occupancy of the expansion.

Transportation Systems Management. In addition to the TDM measures presented above, NPS would also pursue implementation of the following Transportation Systems Management (TSM) measures. TSM measures are intended to alleviate traffic congestion at peak demand periods and could include:

- Conzelman Road would be opened to one-way outbound vehicular traffic during peak traffic conditions as a means to alleviate congestion on Alexander Avenue in the vicinity of U.S. 101 and Danes Drive. The decision to implement this measure would be reviewed with relevant jurisdictions, and would be based on review of data gathered during Monitoring Program discussed later in this section. Any use of Conzelman Road for this purpose would require implementation of protective/safety measures for bicyclists and pedestrians.
- During special events requiring a park permit (as described under the TDM discussion), the NPS could require the use of traffic control officers at potential bottleneck locations to

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improve traffic flow and safety. This measure could also be used to alleviate construction-related effects if deemed necessary through monitoring. If implemented, this measure will be reviewed with the GGBHTD, Caltrans, and other relevant agencies to ensure coordination with their operations and assure that proper permits are received and qualified personnel employed.

- Temporarily or conditionally closing East Road to general through traffic such that vehicle access to Sausalito is discouraged. Implementation of this measure would be reviewed by the NPS in conjunction with the data compiled from the monitoring program, and consultation with relevant agencies.

Offsite Transportation Enhancements. The measures presented below would require approval by other agencies (i.e., GGBHTD, Caltrans). The NPS has already consulted the GGBHTD regarding the proposed Alexander/Danes improvements. The GGBHTD has concurred with the recommendations, and the NPS would pursue implementation of these actions following the Record of Decision (ROD). Implementation of the two other items, although not necessary to reduce a significant adverse impact identified in this EIS, are being proposed by the NPS to improve existing conditions (traffic flow and safety) within the project area.

- Alexander Avenue/Danes Drive – NPS proposes to coordinate with the appropriate agencies to re-configure the Danes Drive approach to this intersection. With the re-configuration, the skewed approach angle of Danes Drive would be converted to a more perpendicular alignment by narrowing the intersection flare. This would improve conditions for the eastbound right-turn movements from Danes Drive, eliminating the need for the driver to turn more than 90 degrees to see southbound on-coming traffic. It would also allow the extension of the southbound left-turn lane on Alexander Avenue into Danes Drive adding storage capacity for roughly two additional passenger cars in the left-turn lane. As part of the re-striping, a “Keep Clear” area would be established on Alexander Avenue to keep vehicles from blocking the intersection during periods of peak congestion or queuing. The NPS would conduct a signal warrant analysis for this intersection for review and discussion with relevant transportation agencies.
- Alexander Avenue / East Road – NPS proposes to coordinate with relevant agencies to implement changes to this intersection to improve channelization and provide clearer direction to drivers on the proper use of the intersection. To achieve this, an operational analysis during peak traffic demand conditions would be used to identify, design and construct appropriate roadway alignment, and traffic control features such as new directional signing, use of raised or striped islands to channelize vehicles and/or other methods to improve sight distance.
- NPS would work with GGBHTD and Caltrans through the Parklands Transportation Task Force to explore opportunities under other agencies’ jurisdictions to alleviate congestion and backup experienced along the Alexander Avenue approach to US Highway 101 and improve bicycle and pedestrian safety. NPS would also consult with GGBHTD and Caltrans to develop and implement channelization improvements to the west side of the Alexander Avenue interchange at Highway 101.

Monitoring Program. Consistent with NPS-12 (NPS NEPA Guidelines), a Monitoring Program would be implemented by the NPS to:

1. measure the effectiveness of the proposed mitigation measures; and
2. verify that no impacts greater than those already analyzed and mitigated in the EIS occur.

Mitigation Measures Included as Part of the Proposed Action

The Monitoring Program would establish an ongoing traffic data collection program; during pre-construction, construction, and post-project implementation periods. Periodic data collection would include, but not be limited to:

- Ongoing traffic monitoring during peak season weekends; and
- Collection and analysis of directional hourly traffic counts and queuing data from 2:00 p.m. Friday to 8:00 p.m. Sunday at three locations:
 - Bunker Road south of Danes Drive;
 - Alexander Avenue between Danes Drive and East Road; and
 - East Road south of Alexander Avenue.

The traffic data set would be used to develop mitigation “trigger levels or thresholds” which would assist the NPS with the timing/implementation of the traffic mitigation measures identified in the EIS. These triggers/thresholds would also be developed and used by the NPS to implement contingency measures in the event that traffic generated by the Proposed Action exceeded the impacts projected in this EIS. Such measures could include more stringent TDM requirements (i.e., more rigid controls related to employee arrival/departure times), increased use of the TSM measures presented above, and/or implementation of the future measures described under the TDM program (i.e., those that “could” be implemented).

In addition, NPS would periodically evaluate the effectiveness of its TDM program by collecting data on the use of various transportation modes. Such data could consist of vehicle occupancy, transit ridership, and bicycle and pedestrian volumes. The NPS would review such data with relevant transit agencies in order to promote and maximize the use and availability of alternative modes of transportation at Fort Baker.

The Monitoring Program would be developed in consultation with the Parklands Transportation Task Force and City of Sausalito, and data gathered as part of the program would be shared with the member agencies of the Task Force and Sausalito to promote and extend a regional approach to transportation systems management.

2.6.7 Air Quality and Noise

Construction Hours. To control the daily duration of construction-generated noise impacts, the NPS would limit hours of construction to the times between 7 a.m. and 5 p.m. Monday through Friday, except when construction deadlines make this infeasible. No construction would be allowed on Saturday or Sunday, except when construction deadlines make this infeasible. The limitations on hours of construction would be binding by their inclusion in contract documents for authorizing the work of construction contractors.

Heavy Equipment Noise. Noise baffling devices would be installed on heavy equipment during site excavation, grading, and/or construction activities.

Traffic Noise. To reduce noise from vehicle traffic, the NPS would implement a Transportation Demand Management (TDM) program at Fort Baker to minimize the number of vehicles travelling to and from the site. The TDM program and other transportation-related measures are described in Section 2.6.6. Maintenance and other divisions would use energy-conserving government vehicles. If possible, electric or other alternative vehicles would be used to reduce noise.

Noise Barriers. Temporary barriers would be erected around construction sites and stationary equipment such as compressors, as warranted.

Construction Sites. Construction sites would be limited to the smallest feasible area. Ground disturbance would be carefully controlled to preclude undue damage to vegetation, and soils, and to reduce air, water, and noise pollution.

Bay Area Air Quality Management District (BAAQMD) Control Measures. To reduce construction-generated PM₁₀ emissions, construction contractors would be required to implement the following BAAQMD-required feasible control measures:

- All active construction areas would be watered at least twice daily.
- All trucks hauling soil, sand, and other loose materials would be covered *or* all trucks would be required to maintain at least 2 feet of freeboard.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- All paved access roads, parking areas and staging areas at construction sites would be swept daily (preferably with water sweepers).
- Streets would be swept daily (preferably with water sweepers) if visible soil material is carried onto adjacent public streets.

2.6.8 Visual and Aesthetic Resources

Preservation of Character. Landscape changes would be in keeping with the historic character of the site. Natural and historic resources of the site would be preserved. Visitor use levels would be monitored and management actions taken led to preserve the special quality of the site.

Protection of Natural Darkness. Lighting would be minimized to protect natural darkness. New outdoor lighting would be limited to areas required for safety, and would be low to the ground and muted.

Scenic Viewing Locations. Scenic viewing locations would be provided or improved along East Road, the cliffs and batteries, and Lime Point Trail.

Landscape Plants. A pallet of nonaggressive, noninvasive landscape plants, compatible with the historic district, would be provided for landscape maintenance and rehabilitation, and would be used in lease and park partner agreements.

Tree Removal. Habitat restoration involving tree removal would be carried out in phases to minimize visual impact.

Signage. Signs would be carefully planned and designed to fulfill their important role in conveying an appropriate image for Fort Baker and in providing information and orientation to visitors. Signs would reflect the site's unique resources and values. Entrance and other key signs would be distinctively designed to reflect the character of the site. Signs would be held to the minimum number, size, and wording required to serve their intended functions, so as to minimally intrude upon the site's natural or historic setting. They would be placed where they do not interfere with visitors' enjoyment and appreciation of site resources.

2.6.9 Recreation and Visitor Use

Restrictions on Recreation and Visitor Use. The NPS would manage recreational activities at Fort Baker so as to protect and preserve its natural and cultural resources, provide for public enjoyment, promote public safety, and minimize conflicts with other visitor activities and site uses. The NPS would take management actions if onsite monitoring determines that visitation levels exceed desired conditions. The actions for managing recreational activities include: public use limits and closures; controlling auto access wherever possible; informing visitors of opportunities in less heavily used areas; implementing use restrictions on trails, boating, the boat ramp and parking; and other practical management strategies. Restrictions on recreational use would be limited to those necessary to protect the site's resources and values and to promote visitor safety and enjoyment. Public use limits established by the NPS would be based on professional judgment, law and policy, USFWS consultation, the results of scientific research and other available data.

Event Guidelines. Event guidelines would be established to assure that events are small- to medium-sized, and that the location, frequency, duration and nature of events at Fort Baker are compatible with the conference and retreat center and the quiet character of the site, and protective of the site's natural and cultural resources.

Accessibility for Disabled Persons. Every reasonable effort would be made to make the facilities, programs, and services of the NPS and its Fort Baker park partners accessible to and usable by all people, including those who are disabled. This policy is based on the commitment to provide access to the widest cross section of the public and to ensure compliance with the intent of the Architectural Barriers Act (42 USC 4151 et seq.) and the Rehabilitation Act (29 USC 701 et seq.). Specific guidance for implementing these two laws is found in the secretary of the interior's regulations regarding "Nondiscrimination in Federally Assisted Programs" (43 CFR 17). Special, separate, or alternative facilities, programs, or services would only be provided when existing ones cannot reasonably be made accessible. The determination of what is reasonable would be made after consultation with disabled persons or their representatives.

2.6.10 Infrastructure

Upgrades and Replacements. Infrastructure would be upgraded to provide a sustainable, functioning, code-compliant support system for the safe and efficient operation of the site and preservation of historic structures. Loads would be reduced to the greatest extent possible. This would reduce the extent and cost of new utilities or upgrades to existing utilities. The following specific strategies would guide the more detailed design of the infrastructure upgrades and replacements for Fort Baker:

- Energy efficient strategies would be applied to new and rehabilitated structures through the establishment of performance standards to address the building envelope, mechanical systems, electrical systems and lighting systems.
- Distribution systems for electricity, gas, water and telecommunications would be upgraded and/or replaced generally in the existing utility corridor, or a new utility corridor following roadways and keeping to the developed footprint of the site.
- The water reservoir would be upgraded to improve its seismic condition and to provide a new concrete block building near the storage reservoir for improved chlorination capabilities, installation of a backflow preventer on the water line serving the dock area, replacement of deteriorated or inoperable fire hydrants, and repair/rehabilitation of system to provide adequate fire flows.

- Water conservation strategies for use in buildings and for irrigation would be implemented through performance standards designed to meet or exceed requirements of the Energy Policy Act.
- Infiltration/inflow (I/I) problems would be addressed at Fort Baker and the areas within the Marin Headlands served by the SMCS D prior to occupancy of the proposed conference and retreat center. Preliminary design work indicates that replacement of approximately 1,300 feet of existing sanitary sewer lines with new larger-diameter lines would be necessary. The pumping station near the historic boathouse would be improved through replacement of existing pumps, motor starters and an emergency power generator. Existing sewer manholes would be replaced or repaired. Any storm drains found connected to the sanitary sewer system would be redirected.
- The NPS would explore with the Sausalito-Mar in City Sanitation District (SMCS D) and Marin Municipal Water District (MMWD) the feasibility of bringing a reclaimed water line to Fort Baker for nonpotable water uses such as irrigating the Parade Ground or nonpotable water needs in newly constructed buildings.
- Existing storm drains would be repaired and rehabilitated as necessary. Permeable pavement, retention areas and other appropriate drainage site improvements would be made to reduce the flow of stormwater into storm drains and reduce the need for a major capacity increase to the current inadequately sized storm drain system.
- Alternative strategies for energy production would be evaluated and incorporated into the final design as appropriate, including photovoltaic systems for generating peak electrical energy demand. Photovoltaic systems, if determined to be feasible based on further evaluation, would be subject to design review and establishment of design guidelines to ensure compatibility with the historic district. Guidelines would identify appropriate locations, such as flat plate modules on rear roofs of historic structures or parking carports and/or pole-mounted tracking arrays located in visually unobtrusive locations within the developed footprint of the site.

2.6.11 Human Health, Safety, and the Environment

Emergency Response Plan. The NPS would manage emergencies and disasters when they occur at Fort Baker by following policies and procedures in the *GGNRA Emergency Response Plan* (NPS, 1996). The plan describes how the GGNRA would manage and coordinate resources and personnel in a major disaster and would guide decision-making during response and recovery operations. The plan is integrated into emergency response planning for Marin County and is regularly reviewed by the NPS to ensure that it is up to date.

Hazardous Substances and Environmental Remediation. The NPS would not implement elements of the Proposed Action in areas affected by contamination until the Army has undertaken necessary remediation. A Contingency Plan would be developed to address any hazardous substances encountered during the construction phase.

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

APPENDIX B: RESPONSE TO NEPA-RELATED PUBLIC COMMENT

**LETTER FROM MAYOR SANDRA BUSHMASKER, CITY OF SAUSALITO
TO MR. JOHN REYNOLDS, NATIONAL PARK SERVICE
RE: FINAL EIS FOR FORT BAKER PLAN
(DECEMBER 2, 1999)**

The December 2, 1999 letter from the City of Sausalito addresses a range of issues. The following is a response to all comments that are relevant to the National Environmental Policy Act (NEPA) and Final EIS.

Response to Local Concerns

In several locations in the letter, there are statements that the National Park Service has been unresponsive to local concerns and that no meaningful changes to the proposed Plan or EIS have occurred. The National Park Service met with City staff, officials and consultants on more than 15 separate occasions to understand and respond to concerns raised in the City's Draft EIS comment letter (dated 12/7/98). As a result, the National Park Service made changes to the Plan and EIS by conducting additional analysis of the project's effects, strengthening existing mitigation measures and developing new mitigation measures.

Draft EIS Comments of the City of Sausalito

The City states that it believes some of its comments on the Draft EIS were not adequately addressed in the Final EIS. The majority of the comments included in the City's 12/2/99 letter go beyond the scope of its original Draft EIS comments. A response is provided below to the NEPA issues identified in the City's letter and attached memorandum from its transportation consultant.

Traffic and Circulation

The traffic and circulation issues addressed in Sausalito's letter and attached memorandum, are addressed below. The majority of the issues raised relate to the methodology used in conducting the impact analysis. These issues have been discussed in meetings with the City and its transportation consultant. As a result of these discussions, the analysis in the Final EIS was modified to incorporate additional data and documentation of traffic conditions provided by the City and new and more stringent mitigation measures were developed and included in the Final EIS. The National Park Service retained outside transportation experts to bring additional expertise to the project, review existing analyses and to prepare additional evaluation of issues raised by the City of Sausalito. Many issues were resolved, however, there remains a difference in professional opinion regarding certain aspects of the methodology used to assess traffic impacts, specifically seasonal variation in traffic conditions and assumptions used for trip distribution patterns.

Seasonal Variation

The City of Sausalito expressed concern related to the use of existing traffic data that was obtained during January and February, indicating that it did not reflect summer conditions. In response to this concern, the National Park Service provided the City with documentation (April 12, 1999) of the methodology used to account for seasonal variation. Clarification of this methodology was also incorporated into the Final EIS. In summary, the traffic counts collected in January and February were factored up based on monthly summertime (peak) data from East Fort Baker Bunker Road. The seasonal variation factor developed was compared against Golden Gate Bridge toll volumes and data from US Highway 101 in the vicinity of Alexander Avenue for the same time period. This comparison confirmed that the factor developed represents a reasonable estimate for seasonal variation in this area. In the summer of 1999, the National Park Service conducted a queuing analysis (including traffic counts) in response to the concern expressed by the City of Sausalito. This information was also provided to the City, and a discussion of this issue was incorporated into the Final EIS (Section 3.6.3 and 4.2.6).

Trip Generation

The majority of the transportation-related comments provided in the City's 12/2/99 letter and attachment are based on the assumption that *future* land uses (i.e., the proposed retreat and conference center) will have the same trip distribution and travel patterns as existing uses. The National Park Service does not agree with this assumption, and believes that use of this approach would generate inaccurate traffic projections for the Fort Baker Plan. In addition, the City's methodology relies entirely upon existing travel patterns at the Alexander Avenue/Danes Drive intersection assuming that all trips traveling through this intersection are en-route to Fort Baker. The Alexander/Danes intersection is one of two major access points to the Marin Headlands. Existing traffic data for this intersection indicates that the volume of Marin Headland trips is 400% greater than the volume of trips destined to and from Fort Baker. National Park Service staff and transportation consultants have discussed this issue with the City of Sausalito and its traffic consultant at several meetings including April 5, 1999, and provided a written response on May 27, 1999.

The queuing analysis conducted in September 1999 (as described in the Final EIS and provided to the City) was prepared in response to the City's comments on the Draft EIS. In its 12/2/99 letter and attachment, the City uses the data collected during this study to develop trip distribution percentages and recommends that these factors be used to determine future trip distribution associated with the Fort Baker Plan. As stated above, the National Park Service believes that applying existing travel patterns to future land uses which are different from existing uses will not provide an accurate assessment of actual traffic effects. In addition, the basis of the City's trip distribution assumptions for East Road is that *all* vehicles exiting Fort Baker on the September 1999 weekend traveled to Sausalito. Vehicles exiting Fort Baker from East Road have two turning options: left towards Highway 101 away from the City of Sausalito, or right towards Sausalito. Therefore any percentages which ignore this condition, and assume all cars will turn

right, could not provide accurate representation of *existing* conditions. For the Danes Drive/Alexander Avenue intersection, the City's methodology assumes that all trips in the intersection were generated by Fort Baker users. As mentioned above, this intersection also serves as a primary access point for the Marin Headlands and the volume of Marin Headlands trips at this intersection is 400% greater than those associated with Fort Baker.

In the City's 12/2/99 letter it indicates that the assumptions used to determine percentage distribution for trips was based "entirely (on) professional guesses." The original EIS transportation report (WSA, 1998 as amended), and May 20, 1999 Technical Memorandum (WSA) were provided to the City to articulate the basis of the assumptions. As described in these documents, a range of data sources was reviewed and considered in the development of the assumptions used in the traffic analysis. Examples of these sources include regional travel data from Association of Bay Area Governments and Metropolitan Transportation Commission, trip distribution data from other retreat and conference centers, and distribution of air travel at the major airports in the SF Bay Area. All of these data sources, the type of land use and knowledge of the operations at other existing centers, were considered in the development of the assumptions.

LOS Analysis

The City's transportation consultant raises a new question related to the LOS analysis stating that "Intersection level of service (LOS) is presented as an overall average condition for the stop sign controlled intersection of Danes Drive with Alexander Avenue" and that "standard practice would report the LOS found for each traffic movement that has to stop or yield".

TRAFFIX 7.0, a third-party computer software package, was used to evaluate existing and future levels of service at the intersection of Alexander Avenue/Danes Drive. This software represents the "state of the practice" for traffic impacts evaluation. *TRAFFIX* provides, among other data, the results for average intersection delay, highest (worst) intersection approach level of service and vehicle delay for each intersection approach individually. This data was presented in the Appendix of the *Fort Baker EIS Transportation Report* (Wilbur Smith Associates, August 7, 1998). The summary tables presented in that report and in the Final EIS document report the overall intersection delay (in seconds per vehicle) and the LOS for the highest (worst) approach; the detailed calculations and results are shown in the Appendix of that report. This has been the standard practice in transportation analyses for many years.

The City's transportation consultant also states that "Using the January 1998 traffic count at the [Danes Dr./Alexander Ave] intersection, the eastbound left turn [Danes Drive] ... experiences an unacceptable LOS E under existing traffic loads. The addition of project traffic would exacerbate this existing substandard condition."

This statement is not supported by data or any other explanation and it is unclear what the basis for this statement is. The calculations shown in the Appendix of the *Fort Baker EIS*

Transportation Report (August 7, 1998) document that the one-lane eastbound approach to the Danes Dr./Alexander Ave. intersection operates at a LOS B under existing conditions (for both weekday and weekends), and it is projected to operate at a LOS B (on weekdays) or at a LOS C (on weekends) in the future under the proposed Plan.

Cumulative Traffic Effects

The Fort Baker Plan Final EIS provides an analysis of the cumulative effects of the project. The cumulative traffic analysis in the Final EIS was revised to incorporate information provided by the City of Sausalito. The City states that the analysis does not consider the “112,400 square feet of mixed light industrial and commercial office space” development planned in the City. The cumulative context considers not only this development, but build out of the approved *Sausalito General Plan*. As requested by the City, the National Park Service relied on the documents transmitted by the City of Sausalito on December 31, 1998 including: General Plan Circulation Element Technical Analysis, the Sausalito Downtown Parking Survey and Shared Parking Model, the Village Fair Hotel Conversion Project Traffic and Parking Study, the 30 Libertyship Way Transportation Impact Study, and the Marinship Improvement District Transportation Study. In addition to the traffic-related reports, the *Sausalito General Plan* was also reviewed and used in preparation of the Draft EIS. The Land Use section (4.2.9.1) of the EIS cites Sausalito General Plan policy LU-6.10.3 which states that the City will “promote the continued recreational and education uses and preservation of existing facilities at Fort Baker.”

The City and its transportation consultant question the conclusion of the Final EIS related to cumulative effects on downtown Sausalito intersections. As described in Section 4.2.6.8 (Cumulative Effects - Conclusions), the Proposed Action would contribute an increase in cumulative traffic in downtown Sausalito between 1-4% before mitigation. Following mitigation, this effect would be reduced and overall this contribution would be considered small and within the normal daily fluctuation in traffic volume. The EIS presents the information provided by the City of Sausalito indicating that several downtown intersections currently operate at substandard conditions and that these conditions are expected to continue under cumulative conditions. This existing condition would continue regardless of any plans for Fort Baker. In other words, the Proposed Action in the Fort Baker Plan does not create a new substandard condition in downtown Sausalito. As a result, the Final EIS concludes that the Proposed Action would contribute incrementally to this cumulatively significant impact. The National Park Service believes that this is an accurate characterization of the effect of the Proposed Action on downtown Sausalito traffic conditions.

Bicycle Issues

The National Park Service has accepted all traffic mitigation measures proposed by the City of Sausalito, except one. The City’s request to have the National Park Service construct a Class II bike lane at the City entrance – an area designated by the City as an existing hazard – was not included in the Fort Baker Plan Final EIS. Although this

mitigation suggestion was not included in the Fort Baker Plan Final EIS, the National Park Service has already initiated an effort to address this and other traffic concerns along the Alexander Avenue corridor. In spring 1999, the National Park Service along with the Metropolitan Transportation Commission formed a multi-agency task force to address transportation concerns in this multi-jurisdictional area. The task force is comprised of relevant stakeholders including the City of Sausalito, County of Marin, the California Department of Transportation, Golden Gate Bridge Highway and Transportation District, and the National Park Service. The National Park Service believes that the Alexander Corridor task force is the appropriate and necessary forum in which to identify a long-term solution for this existing concern.

The City indicates that it had conducted bicycle counts in 1999. The National Park Service requested a copy of this information, and was provided with the *Sausalito Bicycle Master Plan* (October 1999). On page 13 of the Plan, the City indicates that it has collected 2 days of bicycle counts (one Wednesday in January and one Saturday in September). The City's December 2, 1999 letter indicates that 1,378 bicyclists were counted as "...crossing between Fort Baker and the City." The City's *Bicycle Master Plan*, however, indicates the 1,378 number represents all bicyclists traveling to and from the City of Sausalito. The Plan goes on to state that a notable percentage of these trips were northbound riders who were traveling from the City of San Francisco to Sausalito – riders that were assumed to return to San Francisco via the Sausalito ferry. There is no mention of trips associated with Fort Baker.

One of the "Major Recommendations" presented in the *Sausalito Bicycle Master Plan* is to work with the National Park Service to establish a shuttle between Fort Baker and Sausalito that will accommodate bicyclists. This was identified as a "long-term" project that would be implemented over the next 20 years. The Fort Baker Plan Final EIS includes the provision of a shuttle that will accommodate bicyclists as a required mitigation. In addition, a new mitigation measure was also identified and incorporated into the Record of Decision to further strengthen provisions for bicycle safety.

Conzelman Road Mitigation Measure

In its 12/2/99 letter, the City stated concern related to the wording of the Conzelman Road traffic mitigation measure included in the Final EIS. In response, this measure was modified as part of the Record of Decision to more conclusively state its future use by the National Park Service to alleviate traffic congestion along Alexander Avenue.

Activity Level/Visitation

The City incorrectly cites the Final EIS indicating that the projected peak hour visitation would be "3,000." As stated in Section 4.2.11 of the EIS, the projected peak daily visitation is 2,709. The City also states concern related to the activity level and effect on the site. It was concern for the long-term preservation of the spectacular setting at Fort Baker and its unique natural and cultural resources that led to its inclusion within the boundaries of the Golden Gate National Recreation Area. The National Park Service is

committed to the preservation of Fort Baker for the use and enjoyment of future generations for all citizens of the United States.

Since the 1995 Base Closure and Realignment Act announcement, military presence has been substantially reduced at Fort Baker. In the waterfront area, the Bay Area Discovery Museum, Presidio Yacht Club and United States Coast Guard are present and occupy several buildings, however, the majority of Fort Baker's buildings have been vacated. There are approximately 40 buildings surrounding the historic parade ground, 8 of which were recently used for storage or office space for less than 30 people (by Army 91st Division and National Park Service). A reserve drill typically occurred over one weekend each month involving roughly 200 reservists. As of May 2000, all remaining Army activities have left the site.

The National Park Service recognizes that the dramatic decline in the activity level at Fort Baker, which began as early as the 1970s. Beginning with the master planning efforts in the 1970s, however, the National Park Service and the public have long recognized that the activity level at Fort Baker would increase following base closure and subsequent transfer to the park. The master planning efforts identified that this increase must be carefully balanced to preserve, protect, and enhance the cultural and natural resources while preserving the contemplative qualities of the site identified in the Fort Baker Plan. It was in response to this goal that the National Park Service Proposed Action scaled back the level of development in the approved 1980 GMP.

The primary land use in the historic parade ground – the proposed retreat and conference – was identified for its ability to maintain the contemplative atmosphere of this area, while providing public access, tying the use to the National Park Service mission, and preserving the historic buildings. The success of this type of land use in maintaining a contemplative atmosphere in a park setting is demonstrated at other national and state parks.

Parking

The maximum number of parking spaces that would be allowed under the Proposed Plan is 895, which is 77 spaces more than current conditions (818 spaces). As part of the Proposed Action, existing parking in the central waterfront area and parking around the perimeter of the historic parade ground would be removed and relocated in less environmentally sensitive locations. All parking would be restricted to the existing developed/previously disturbed area, and no natural areas would be converted for parking as suggested in the City's letter. The Proposed Plan was designed to reduce the existing visual prominence of automobile parking, and the National Park Service does not agree with the City's statement that parking would "predominate the landscape."

As a point of clarification, Section 4.2.6.7 of the EIS provides estimates on the potential reduction in parking demand that may be achieved as a result of mitigation. This reduction would decrease demand so that it is *less* than 895 spaces.

Marine Safety

The National Park Service is not proposing to rent kayaks or rent boats to “inexperienced visitors.” Sail training is a current use at Fort Baker and is identified as a potential future use, supervised by an instructor. All programs and activities will be designed to provide a safe experience for the visiting public. Under the Proposed Plan, the USCG will also maintain its facility at Fort Baker where it provides 24-hour search and rescue operations in the Bay and outer coastal areas.

As stated in the Draft and Final EIS, future ferry service at Fort Baker is subject to a separate planning and environmental review process. Ferry service at Fort Baker was considered and evaluated as a cumulative project, and was included as a project component under the 1980 GMP Alternative.

Alternatives

The City of Sausalito recommends a new alternative and states that “no other alternative...was considered.” Many alternative land uses were considered during the public planning process, and of these, four reuse alternatives were identified and carried forward for additional evaluation in the EIS; the Office and Cultural Center Alternative, the 1980 General Management Plan Alternative, the Proposed Plan, and the No Action Alternative. The City’s recommended alternative is very similar to the Office and Cultural Center Alternative evaluated in the EIS.

New Construction

The City correctly states that up to 28,000 square feet of new construction could occur in the historic parade ground area. The City also states concern related to the effect on the historic significance of the buildings. The 28,000 square feet of new construction would be accommodated in two new buildings. As described in the EIS, this construction would be restricted to “infill” sites where buildings were either once located and now removed, or where buildings were proposed but never constructed. The new buildings would be of the same scale as the adjacent buildings, would be designed to be compatible with the historic setting, and would be required to meet *the Secretary of the Interior’s Standards for Rehabilitation of Historic Structures*. The NPS has completed a Memorandum of Agreement with the State Historic Preservation Office for the Fort Baker Plan, and is in compliance with the requirements of the National Historic Preservation Act.

The new space would be necessary to provide open meeting areas and dining facilities which cannot be accommodated in existing historic buildings without adversely altering the historic fabric and interior spaces, or which are considered necessary irrespective of the number of rooms at the retreat and conference center. The need for these new facilities was communicated in the earliest public scoping discussions, including the site tours and workshops held in the summer of 1997.

The practice of “infill” has been used to reduce the impact of new construction in many historic districts including those in the community of Savannah, Georgia. In National Park Service lands, the practice of siting new construction in "infill" sites has been used effectively at Harpers Ferry National Historic Site and at Lowell, Massachusetts, as well as at Fort Baker with the US Coast Guard and BADM facilities constructed in 1990-91.

Size of Retreat and Conference Center

The December 7, 1998 Draft EIS comment letter from the City of Sausalito requested that “...a smaller facility of 150-200 units be given priority by some means of incentive package in the RFP.” The National Park Service is seeking the smallest possible, economically feasible center that meets the objectives of the plan. In response to the City’s request, National Park Service staff worked with the City to develop specific language describing how this may be achieved. To reinforce and demonstrate the park’s commitment, use of this “incentive” in the RFP was included as a mitigation requirement in the Final EIS. [The Request for Qualifications (RFQ), which precedes the RFP, also included this as a selection criteria.]

On April 21, 1999, the City submitted a subsequent letter to the National Park Service in which the City’s preferred size for the retreat and conference center had been reduced to a maximum of 150 rooms. The City’s most recent letter (12/2/99) recommends a center that accommodates groups of 50 to 75 people. The National Park Service is committed to seeking the smallest economically feasible project that meets the objectives of the plan.