

APPENDIX B:
CONCERN STATEMENT REPORT

Golden Gate NRA
34th America's Cup Event, Parkwide
AC34 NEPA Project Description
Concern Response Report

Report Date: 10/21/2011 (revised 6/6/2012)

AL4001 - Alternatives: Duration

Concern ID: 34387

CONCERN STATEMENT: Consider limiting race events to one year.

Response: Considered but dismissed due to magnitude of race staging, preparations, and concentrated impacts to the area.

Concern ID: 34388

CONCERN STATEMENT: Minimize impacts to habitats and visitors of Crissy Field and other event areas by (1) not having such long hours of events and entertainment and (2) doing a thorough job of publicizing other sites and places in San Francisco, especially cultural attractions such as the art museums and the Academy of Sciences, small museums, other park sites, other events, so that people are more widely distributed through the City.

Response: Programmed events and entertainment have been reduced across some alternatives. The EA analysis and event description remains specific to AC34. Analysis of event impacts to Cultural Resources and Socioeconomics is offered in Section 4.6 and 4.13 respectively.

Concern ID: 34389

CONCERN STATEMENT: Consider leaving the AC Village in the Marina Green for 2012 and 2013 instead of shifting it to Piers 27 - 29 as an alternative.

Response: Revised project description in Chapter 2 – Alternatives of the EA.

AL4002 - Alternatives: Intensity

Concern ID: 34390

CONCERN STATEMENT: Consider limiting, or eliminating altogether, the events, installations, concessionaires, jumbotron, and motorized vessels proposed for Aquatic Park.

Response: Revised project description in Chapter 2 – Alternatives of the EA.

Concern ID: 34392

CONCERN STATEMENT: Consider limiting, or eliminating altogether, various in-water project elements (e.g., personal water craft, floating docks, dredging, berthing at Fort Mason).

Response: Revised project description in Chapter 2 – Alternatives of the EA.

Concern ID: 34393

CONCERN STATEMENT: Are we really to understand that up to 24 150-foot boats are to be permitted in Aquatic Park at one time? To understand the potential impact that the installation and berthing of these various boats would have on Aquatic Park, it is necessary, at a minimum, to establish: (a) the maximum number of boats; (b) the maximum size of these boats; (c) the planned functions of these boats, including whether to be moored or continuously moving about; and (d) the potential impact on water quality - as relevant specifically to human swimmers; and (e) the plan for enforcement of limits and other requirements (including prohibitions on emissions)

on all boat traffic into, within, and exiting Aquatic Park.

Response: Revised boating exhibitions and restrictions at Aquatic Park are discussed in EA Chapter 2 – Alternatives, Section 4.1 - Hydrology & Water Quality, and Section 4.11 - Maritime Navigation & Safety.

Concern ID: 34520

CONCERN STATEMENT: *Significant dredging operations are associated with the event, which must be fully evaluated along with potential alternatives. In contrast with other dredging operations throughout San Francisco Bay, dredging in support of the event does not serve a long-term economic benefit to the region. Yet dredging operations will result in significant short- and long-term impacts to benthic communities and disturbance to contaminated sediments, which shall make available for biotic uptake a number of pollutants known to be found in elevated concentrations at the proposed dredging and creosote piling removal sites, including PAHs and heavy metals. We urge the environmental analysis to include an evaluation of alternate dredging proposals intended to minimize disturbance to the maximum extent achievable.*

Response: Revised dredging operations identified in Chapter 2 - Alternatives and Section 4.5 – Biological Resources of the EA.

AL4003 - Alternatives: Geography

Concern ID: 34394

CONCERN STATEMENT: *An alternative method for viewing AC34 would be on Muni Pier, which would provide unobstructed views of the event. In its present condition, Muni Pier currently cannot hold the crowds that are expected for the area. However, it can be repaired and doing so would leave a positive footprint on the Aquatic Park area.*

Response: Municipal Pier access will be managed during race events, as discussed in Chapter 2 – Alternatives of the EA.

Concern ID: 34396

CONCERN STATEMENT: *Consider alternative locations for viewing areas and the jumbotron, such as the City Hall area of the San Francisco Civic Center, Sausalito, and Oakland's Jack London Square and Gateway Park.*

Response: Viewing areas and video displays are analyzed in Section 4.9 - Visual and discussed in Section 2.14.5 of the EA.

AL4004 - Alternatives: Management Zoning

Concern ID: 34397

CONCERN STATEMENT: *Buffer Zones are described at Crissy Field and Alcatraz. Habitat buffers along the coast of the rest of San Francisco and Marin (including around the base of the Golden Gate Bridge and Fort Baker) should also be provided to protect roosting birds at locations used by roosting or nesting birds along these shorelines.*

Response: Considered during alternatives development and addressed in EA Section 4.5 - Biological Resources.

Concern ID: 34398

CONCERN STATEMENT: *Fort Baker Zone Management Planning poster board/graphic needs to shade the Sewage Plant "orange" to designate this area as an occupied building/open continuity required.*

Response: Considered during the alternatives development and graphics updated as deemed appropriate.

AL4005 - Alternatives: Other Alternatives

Concern ID: 34400

CONCERN STATEMENT: *The NEPA should consider other types of vessels for umpiring the races and analyze an alternative WITHOUT use of personal watercraft. The full environmental impacts from personal watercraft must be analyzed: air emissions, noise levels, and disturbance. If the NEPA analysis determines that use of personal watercraft is an environmentally sound option, then it must require use of the newest, cleanest four-stroke watercraft available in the state of California and severely restrict usage of this type of vessel.*

Response: Impacts considered during alternatives development and addressed in respective EA sections (i.e., 4.3 - Air Quality, 4.5 - Biological Resource, 4.8 - Soundscape & Noise, etc.), as appropriate.

Concern ID: 34401

CONCERN STATEMENT: *The approach used by the City/County of San Francisco in the EIR should also be considered: i.e., package all mitigation measures that are deemed feasible and useful to create a "mitigated alternative" version of the Proposed Action that would allow the agencies to approve actions under their jurisdiction. This would be a practical means to achieve consistency with the EIR's "Mitigated Alternative".*

Response: Addressed in EA Table ALT-1 and Table ALT-2 in Chapter 2 - Alternatives.

Concern ID: 34402

CONCERN STATEMENT: *Consider as an alternative, modification of the Event so that it conforms with all existing City, State, and Federal regulations and policies, such that no special approvals are required beyond standard event permitting (in our DEIR comments we refer to this as the "Code Compliant" alternative). Under this alternative, no dredging would occur, nor would federally managed lands and waters be used for race activities, event staging, construction-dependent event viewing, or special events. In addition, no personal watercraft would be allowed per applicable regulations.*

Response: Please refer to EA Table ALT-1 and Table ALT-2 in Chapter 2 - Alternatives.

Concern ID: 34403

CONCERN STATEMENT: *Consider as an alternative, approval of the Event as described in the DEIR, but with only those mitigations which have been finalized and funded. In other words, no consideration should be given to mitigation plans "in development" until such plans have been finalized through an open and transparent public process, and reasonable assurances made that all identified mitigations will be fully implemented and fully funded. To be credited in terms of being included as part of this alternative, a specific mitigation must create a mandatory obligation applied to a specific party's voluntary measures or measures which require little more than further study or consideration would not count.*

Response: Please refer to EA Table ALT-1 and Table ALT-2 in Chapter 2 - Alternatives.

Concern ID: 34405

CONCERN STATEMENT: *Consider as an alternative, approval of the Event including all mitigation proposals by federal permitting authorities deemed necessary to avoid or minimize all significant impacts to federally managed resources.*

Response: Considered, please refer to EA Table ALT-1 and Table ALT-2 in Chapter 2 - Alternatives.

Concern ID: 34406

CONCERN STATEMENT: *Consider as an alternative, approval of the Event including any additional project modifications and/or mitigation proposals developed or supported by the Council, to the degree that such proposals exceed those developed by the City or the federal permitting*

agencies. Given the uncertain status of mitigation proposals currently in development, we are not prepared to submit a complete list of additional mitigation proposals at this time, although some of our specific suggestions might include:

[Mitigation measures (approximately 30) coded individually under Mitigation Measures code]

Response: Considered, please refer to EA Table ALT-1 and Table ALT-2 in Chapter 2 - Alternatives.

Concern ID: 34407

CONCERN STATEMENT: *We would like to express our view that under no circumstances would it be appropriate for the federal agencies to develop an EA with a single action alternative. The full consideration of a reasonable range of alternatives is critical to give decision-making authorities the options necessary to select the most beneficial and least damaging alternative, including the option to select individual components from other alternatives analyzed but not selected in their entirety.*

Response: A range of alternatives have been developed and analyzed and are presented in EA Chapter 2 - Alternatives.

AQ4000 - Air Quality: Impact Of Proposal And Alternatives

Concern ID: 34408

CONCERN STATEMENT: *Additional Air Emissions from the Portable Generators, Propeller Driven Service Vessels - Please require the Clean Air Act and its applicable regulations be fully addressed and complied and the activities of the installation, maintenance and operation of the "floating screens" be permitted to account for the pollutants generated by these additional air emissions.*

Response: Addressed in EA Section 4.3 – Air Quality.

Concern ID: 34410

CONCERN STATEMENT: *Engage the Bay Area Air Quality Management District early in the NEPA process to ensure that the project is compliant with the Clean Air Act's General Conformity Rule. General Conformity will pertain to all project components - direct, indirect, and cumulative.*

Response: Federal agencies have followed the General Conformity Rule Process, as addressed in Chapters 1, 2, and 4.

CR4000 - Cultural Resources: Impact Of Proposal And Alternatives

Concern ID: 34411

CONCERN STATEMENT: *All impacts of AC34 on historic and archeological resources located on lands administered by the federal government must be fully evaluated along with potential alternatives. These impacts include, but are not limited to the following:*

1) Impacts on historic resources proposed to be used as AC34 primary and secondary viewing areas, including those located on federal lands within Fort Mason, Aquatic Park, Crissy Field, the Presidio, Cavallo Point, Marin Headlands, Fort Baker, Baker Beach, the Presidio, Fort Point, and publicly accessible areas of Yerba Buena/Treasure Island; and

2) The potentially significant impacts on historic earthen fortifications in or near the primary event venues and within the secondary viewing areas at risk from erosion due to increased visitation primarily on lands managed by the GGNRA.

Response: Impacts have been analyzed in EA Section 4.6 - Cultural Resources.

Concern ID: 34412

CONCERN *The APE must include all geographic areas that could contain archeological, architectural,*

STATEMENT: *or paleontological resources that would be subject to impacts from the proposed action, including all connected actions. This includes a below-ground vertical component in those areas that would undergo subsurface physical changes as a result of the proposed action.*

Response: Impacts have been analyzed in EA Section 4.6 - Cultural Resources.

ED1000 - Editorial

Concern ID: 34413

CONCERN STATEMENT: *Provide more detail regarding the numbers of vessels and spectators anticipated, and how those numbers were derived.*

Response: Spectator estimates and methodology have been developed and refined by AECOM, ORCA Consulting.

Concern ID: 34414

CONCERN STATEMENT: *As a project sponsor, a complete description of the America's Cup Event Authority, LLC, including members, officers, ownership interests and corporate partners must be included in the background information in the NEPA document. Further, given the relationship of the Event Authority to the Golden Gate Yacht Club, which is the current defender of the America's Cup that has been entrusted under the "Deed of Gift" with responsibility for the organization of AC34, please disclose and discuss whether the long term development rights granted to the Event Authority under the Host Agreement will transfer with the "Deed of Gift" as a registered trust document in the Supreme Court of the State of New York in Albany, NY.*

Response: Comment noted. Is beyond the scope of this EA.

Concern ID: 34415

CONCERN STATEMENT: *In future planning efforts, please consolidate and more clearly communicate the materials upon which you are soliciting comment, provide an option to submit comments via email (or increase the number of pages that can be submitted via PEPC), and provide the names of the federal official(s) with project supervision or decision-making authority, so that people know the name and title of the person(s) to whom they should be directing their comments.*

Response: The federal team will consider when preparing for release of public draft EA.

Concern ID: 34416

CONCERN STATEMENT: *Please describe more fully the types of activities that will be held at Ft. Baker at Cavallo Point, and how people would be prevented from descending the hill, in to Mission Blue Butterfly habitat, to view the race.*

Response: Project description, management actions, and protection measures are discussed in Chapter 2 – Alternatives and impacts to sensitive habitat are analyzed in EA Section 4.5 – Biological Resources.

Concern ID: 34417

CONCERN STATEMENT: *Figure 3 of the Project Description presents the Proposed Aquatic Park Venue Plan. However, it does not appear that aspects of this diagram are to scale. It is remiss and misleading that an omission for the boats, barge and other proposed structures in Aquatic Park are not be presented to scale. Further, although this diagram shows only six boats, other sections of the draft EIR present the impression that more than six boats would be permitted in Aquatic Park. Again, it is remiss and an omission for the proposed number of boats to not be accurately presented in this diagram.*

Response: Comment noted.

Concern ID: 34418

CONCERN STATEMENT: *Potential sources of visitation data include: fireworks, Sausalito, Tiburon Chamber of Commerce, Ferry District- GG Ferry, Blue & Gold and Red & White Fleets, Bob's Bikes, and*

Response: Plymouth England's November World Cup race.
Comment noted.

Concern ID: 34419

CONCERN STATEMENT: *The EA should provide a more defined and clear description of the race area including, but not limited to how the race area will be used (i.e., how many hours a day, restricted boating areas, etc.), the location of the spectator fleet, the use and restrictions associated with the spectator fleet, and how the race area will be managed and enforced. The EA should also analyze how many Coast Guard vessels and/or water based law enforcement vessels will be needed to adequately ensure the safety of boaters on the Bay during and after the race events.*

Response: Commenter is referred to EA Chapter 2 – Alternatives.

Concern ID: 34420

CONCERN STATEMENT: *Increased maritime commerce as a result of the America's Cup must be analyzed for potential environmental impacts. For example, additional cargo ships carrying America's Cup race vessels, supplies, race management vessels and other equipment into San Francisco Bay may contribute to higher levels of air pollution, water pollution, noise, disturbance, collisions with marine mammals and other marine wildlife including leatherback sea turtles.*

Response: Impacts addressed in relevant sections of the EA as appropriate (i.e., 4.3 - Air Quality, 4.2 - Hydrology & Water Quality, 4.8 - Soundscape and Noise, 4.5 - Biological Resources, etc.).

ME4000 - Marine Environment: Impact of Proposal and Alternatives

Concern ID: 34482

CONCERN STATEMENT: *CDFG is interested in the potential impacts to commercial and recreational fishing, potential fuel spills around refueling docks, and noise impacts associated with pile driving. A spill prevention plan should be prepared. CDFG is recommending NMFS noise threshold levels. If impacts to longfin smelt are anticipated, the project team should apply now for an Incidental Take Permit.*

Response: Impacts addressed in relevant sections of the EA as appropriate (i.e., 4.3 - Air Quality, 4.2 - Hydrology & Water Quality, 4.8 - Soundscape and Noise, 4.5 - Biological Resources, etc.).

Concern ID: 34517

CONCERN STATEMENT: *Evaluate the impacts of and potential alternatives to dredging, pile driving, demolition and other in-water work, and the implications for humans, fish and other aquatic organisms.*

Response: Addressed in EA Sections 4.5 Biological Resources and 4.2 Hydrology and Water Quality sections.

Concern ID: 34518

CONCERN STATEMENT: *Examine the impacts to Bay from shading associated with floating docks, anchoring piles, wave attenuators and barges.*

Response: Impacts addressed in EA Section 4.5 Biological Resources.

MM4001 - Mitigation Measure: Adaptive Management

Concern ID: 34427

CONCERN STATEMENT: *The EA should allow for adjustments to be made to the way events are conducted, including scaling down project components at Crissy Field or implementing active management strategies, so as to eliminate unacceptable impacts.*

Response: Considered during alternatives development and discussed in the EA's Chapter 2 - Alternatives and Section 4.5 - Biological Resources.

MM4002 - Mitigation Measure: Air Quality

Concern ID: 34428

CONCERN STATEMENT: *To mitigate the transportation and air quality impacts from the project, the NPS, city, port and AC should provide a water taxi along the waterfront that connects key park service viewing locations that is zero or near-zero emissions and that operates primarily on renewable energy.*

Response: Comment noted.

Concern ID: 34429

CONCERN STATEMENT: *To reduce GHG emissions, require event-related vessels to meet state standards for marine engines, use low- or no-emissions vessels, use biodiesel fuel, use shoreside power when docked, and to shut down engines when anchored on Bay.*

Response: Impacts discussed in EA Section 4.3 Air Quality and event protection measures listed in Chapter 2 - Alternatives.

MM4003 - Mitigation Measure: Socioeconomics & Environmental Justice

Concern ID: 34430

CONCERN STATEMENT: *Identify significant impacts to park resources that could result from the event, develop cost estimates for protection and/or recovery of those assets, as well as provisions for safety and access of both regular and event visitors, and obtain specific commitments from project sponsors to ensure costs are fully recovered by the park.*

Response: Financial considerations addressed in Section 4.12 Facilities and Operations, and Section 4.13 Socioeconomics discusses impacts to local economy.

Concern ID: 34431

CONCERN STATEMENT: *Develop an environmental justice mitigation plan that will be required to be implemented by the America's Cup Event Authority to ensure that people who live and work in the San Francisco Bay Area, particularly low income communities of color, benefit from the project and are not denied public access or prevented from getting to and from work as a result of the project.*

Response: Impacts analyzed and discussed in EA Section 4.13 - Socioeconomics.

MM4004 - Mitigation Measure: Marine Environment

Concern ID: 34424

CONCERN STATEMENT: *The EA should provide information about whether any eelgrass beds exist on or near GGNRA property and, if so, how these beds will be protected. The influx of boaters will increase the risk to eelgrass (e.g., at Richardson Bay) and boaters must be kept away from them to ensure protection. Measures that would be used to prevent impacts should be presented.*

Response: Addressed in EA Section 4.5 Biological Resources.

Concern ID: 34432

CONCERN STATEMENT: *The US Coast Guard should require that all race management, spectator, private, commercial and media and other marine vessels (including superyachts, recreational boats, barges, and personal watercraft) participating in the America's Cup project comply with and exceed the most stringent environmental standards as required by the state of California, the city of San Francisco and other entities with regulatory authority over San Francisco Bay.*

Response: Compliance discussed in Section 4.11 - Maritime Navigation and Safety.

MM4005 - Mitigation Measure: Monitoring & Enforcement

Concern ID: 34433

CONCERN STATEMENT: *Consider the capacities and authorities of NPS and USCG to monitor and enforce resource protection laws, as well as the cost of doing so. Law enforcement presence is essential, monitors are not sufficient.*

Response: Existing staff would be augmented by Incidental Command System.

Concern ID: 34435

CONCERN STATEMENT: *Biological monitors should be required (and paid for by the Project Sponsor) on all federal lands that will suffer impacts [to birds] from construction in preparation of AC34.*

Response: Biological monitoring responsibilities are discussed the protection measures listed in Chapter 2 – Alternatives.

Concern ID: 34436

CONCERN STATEMENT: *We recommend that a comprehensive Monitoring and Enforcement Program be developed and implemented, as a more effective way to address potential water quality and other impacts are reduced to a less than significant level. A Monitoring and Enforcement Program should address protection of both water quality, wildlife habitat and wildlife. It should ensure that there is adequate oversight of boating and on-shore visitor activities of spectators on-land, and ensure that there is prompt enforcement of water quality laws and regulations, and that penalties are imposed and other actions taken when warranted.*

Response: Please refer to EA Chapter 2 –Alternatives, Table ALT-2 for a description of management and protection measures.

MM4006 - Mitigation Measure: Park Operations & Facilities

Concern ID: 34437

CONCERN STATEMENT: *It is extremely undesirable to have portable restrooms located at the historic entrance to the Dolphin and East End Rowing clubs for what could potentially be months out of each year. They are unsightly and tend to cause air and land pollution. A much preferred mitigation is to upgrade the currently closed permanent restrooms located by the bleachers and maritime museum. Upgrading and reopening these restrooms would also help fulfill the NPS objective of restoring park assets to pre-event or better conditions.*

Response: Considered in impacts analysis in EA Sections 4.6 Cultural Resources and 4.7 Visitor Use and Experience.

MM4007 - Mitigation Measure: Transportation

Concern ID: 34438

CONCERN STATEMENT: *Promote non-motorized transportation alternatives for accessing spectator venue areas through: improved signage, trail and bicycle lane upgrades, and designated bicycle parking areas. Ensure bicycle safety between South Marin and San Francisco, including along Alexander Drive, Sausalito Lateral, Aquatic Park, Fort Mason, and Crissy Field.*

Response: Analyzed and discussed in EA Section 4.10 - Transportation.

Concern ID: 34439

CONCERN STATEMENT: *The proposed TEP modifications to the 43-Masonic MUNI route would pick-up and drop-off passengers closer to the Crissy Field event site. Extension of the F-Line to the northern waterfront and extension of the 29-Sunset MUNI route farther into the Presidio should be*

considered as well. The operation of shuttle services (e.g., operation of PresidiGo downtown service on weekends) and increased frequency on existing PresidiGo service should be considered to improve transit access to Crissy Field. Finally, increasing the frequency on all transit service to the Presidio should be considered as adjustable measures to accommodate crowds of varying size. Substantial parking fees and an extensive public outreach campaign describing the limited amount of parking, parking costs, transit alternatives and shuttle operations should be used to encourage attendees to use alternative modes to access the Crissy Field site.

Response: Comment considered in transportation analysis. See EA Section 4.10—Transportation.

Concern ID: 34440

CONCERN STATEMENT: *We propose the following to share the special area and world class event: 1. Approximately 350 parking spaces exist in the West Crissy area. Restrict parking in the area during these events. Distribute 175 parking passes for event coordinators and 175 parking passes for tenant employees allowing them to work as usual; 2. Restrict entrance at the intersection of Mason and McDowell to parking pass holders and shuttle vehicles only; 3. Schedule shuttle services from nearby parking areas of the park at 15 minute intervals for use by both event attendees and participants in already existing businesses in the area. Consider charging a minimal fee for this service; 4. Staff officers to ensure traffic flow through the area to the Golden Gate Bridge, etc. along Mason St. at projected bottlenecks; 5. Increase parking availability for the shuttle system. Possible areas to expand for special events would be the field at Fort Winfield Scott and vicinity, Main Post, current construction zone areas, Log Cabin, etc.*

Response: Parking analysis has been developed with consideration of this suggestion in EA Section 4.10 Transportation.

Concern ID: 34441

CONCERN STATEMENT: *Water & Air Traffic Plan / Public Information Program: These plans will develop the details of water circulation during race events for all forms of watercraft and identify necessary public information messages. To accommodate the races, commercial shipping will have to be concentrated during times when the races are not underway. As a result, this will create especially dangerous conditions on the water for kayakers and other non-motorized boaters. Information about these conditions should be widely distributed to educate and inform boat users of these safety concerns. [ABAG (Bay Trail)] would like to be involved in the development of the plan to provide input from the non-motorized boater's perspective and minimize these impacts.*

Response: Portions of the detailed plans have been represented in the protection measures listed in the EA Chapter 2- Alternatives and analyzed in Section's 4.7 Visitor Use and Experience and 4.11 Maritime Navigation .

MM4008 - Mitigation Measure: Visitor Use & Experience

Concern ID: 34443

CONCERN STATEMENT: *The EA should identify specific, measurable management objectives related to the visitor experience, and assess how much impact can be tolerated before management intervention is required. The EA should determine what visitor experience conditions would warrant the Trust to use its discretionary authority to impose traffic restrictions and public use limits (see 36 CFR 1001.5). Mitigations to avoid adverse impacts on desired visitor experiences, to include conducting visitor information and education programs, separating conflicting uses by time or location, and issuing permits and reservations, should be identified. Monitoring of AC34 visitor levels should be required to address unacceptable impacts to the visitor experience.*

Response: Impacts relating to Visitor Use and Experience are discussed in Section 4.7 – Visitor Use &

Experience.

MM4009 - Mitigation Measure: Wildlife & Habitat

Concern ID: 34444

CONCERN STATEMENT: *Sensitive habitat both within and en route to spectator viewing areas not identified in the project description must be identified, impacts analyzed and mitigation proposed.*

Response: Habitat protection measures are discussed in EA Chapter 2 - Alternatives and Section 4.6 Biological Resources.

Concern ID: 34446

CONCERN STATEMENT: *To the extent that additional fencing is used to restrain spectators from entering sensitive habitat areas, the DEIS must precisely identify such areas and also identify any environmental impacts arising from the fences themselves. Mitigation measures must be in proposed to reduce such impacts.*

Response: Habitat protection measures are identified in the protection measures listed in Chapter 2 - Alternatives.

MM4010 - Mitigation Measure: Recreation

Concern ID: 34448

CONCERN STATEMENT: *It is our understanding that during the America's Cup events, access to the San Francisco Bay shoreline edge will be significantly restricted for small watercraft such as kayaks within and around the race area. In addition, there is the potential for the permanent loss of open water basins that will have a direct impact on non-motorized small boat users. The changes to these areas, Piers 14-22, Pier 27 and Piers 30-32, should require mitigation to offset the impacts. We request that the improvement of existing non-motorized boat launch sites and creation of new sites along the waterfront be included as mitigation...*

Response: Impacts to non-motorized boat recreational water users have been addressed in EA Sections 4.7 Visitor Use and Experience and 4.11 Maritime Navigation and Safety.

MM4011 - Mitigation Measure: Vegetation and Riparian Areas

Concern ID: 34450

CONCERN STATEMENT: *Erect, maintain, and enforce fencing and signage to protect sensitive native vegetation and sensitive habitat areas.*

Response: Comment noted. Protection measures listed in Chapter 2 - Alternatives (Table ALT-2) identify the details of the fencing and signage efforts. Commenter is also referred to Section 4.6 - Biological Resources.

MM4012 - Mitigation Measure: Soundscape & Noise

Concern ID: 34451

CONCERN STATEMENT: *Prohibit the use of fireworks during bird nesting season, and ensure that amplified sound is shut off at 10 PM at the latest*

Response: Sound impacts have been analyzed in the EA's Section 4.5 - Biological Resources and Section 4.8 - Soundscape and Noise.

MM4013 - Mitigation Measure: Sustainability

Concern ID: 34453

CONCERN STATEMENT: *Provide adequate jug-filling stations and drinking fountains so that there will be no need for any single use plastic water bottles:*

Provide receptacles for recyclables, compostables and landfill as well as monitors to instruct the public in their use;

Restrict the issuance of vendor permits to businesses that adhere to zero-waste and plastics free practices; and

Prohibit the release of any helium balloons.

Response: Please refer to the impacts addressed in EA Section 4.7 - Visitor Use and Experience.

NS4000 - Navigational Safety: Impact of Proposal and Alternatives

Concern ID: 34455

CONCERN STATEMENT: *Consider the Event's impacts to commercial vessel traffic, including channel dredging windows and cargo of concern that requires armed USCG escort.*

Response: Impacts to commercial vessel traffic have been analyzed in the EA's Section 4.11 - Maritime Navigation and Safety.

ON1000 - Other NEPA Issues: General Comments

Concern ID: 34456

CONCERN STATEMENT: *We have no knowledge of a NOI having been prepared and published for this project. Should the lead federal agencies determine that an Environmental Impact Statement is indeed required, we would expect to have further input on "the scope of alternatives and impacts" and thus recommend that a NOI be published with a suitable additional comment period.*

Response: Comment noted.

Concern ID: 34457

CONCERN STATEMENT: *The EA must analyze the impacts of actions "connected" to the federal actions under review- not merely impacts upon resources within federal jurisdiction. The "connected actions" improperly excluded from the Project Description include (1) non-federal actions related to the America's Cup events; (2) the James R. Herman Cruise Terminal and Northeast Wharf Plaza ("Cruise Terminal") Project; and (3) long-term development that will occur as a result of approval of the America's Cup Project (long-term development rights).*

Response: Impacts of connected actions have been addressed in the EA's cumulative impacts sections.

Concern ID: 34458

CONCERN STATEMENT: *Provide additional explanatory material on how and why this characterization of purpose and need differs from the project purpose outlined in the EIR. We recommend that the various authorities combine forces on a joint EIS/EIR with a purpose and need statement that is sufficiently broad to allow for the consideration of all impacts and alternatives which respond to the broad interests of all the various stakeholders.*

Response: Comment noted. The purpose and need for the proposed action have been revised and are presented in Chapter 1 of the EA.

Concern ID: 34459

CONCERN STATEMENT: *A full EIS is required for this event. The document must consider all relevant resource protection laws, including ESA, NHPA, and Migratory Bird Treaty Act, among others.*

Response: The EA addresses all relevant resource protection laws in the Laws and Regulations sections within each impact topic.

Concern ID: 34460

CONCERN STATEMENT: *The DEIS should include complete versions of the proposed plans (People Plan, etc.) If those plans are not complete and final when the public is asked to review the DEIS, we will be unable to fully assess their contribution to or mitigation of impacts arising from the project.*

Response: Comment noted.

PN8001 - Comply with CWA (USACE-2)

Concern ID: 34461

CONCERN STATEMENT: *While the project sponsor may interpret protecting the environment as a constraint rather than an objective, federal law requires compliance with CWA. The least environmentally damaging alternatives are the most preferable--particularly for a project that benefits only a small sector of the population and is unlikely to provide strong benefits to communities or the environment in the long run.*

Response: Measures necessary to ensure compliance with the CWA have been addressed in the relevant sections of the EA (e.g., Section 4.2 Hydrology and Water Quality).

PN8002 - Objective: Contribute to Park Understanding (NPS-3)

Concern ID: 34462

CONCERN STATEMENT: *Suggestions for ensuring the event contributes to the understanding of the significance of parks include: (1) signage instructing visitors where they can and cannot go and why (i.e., wildlife protection area; the marsh; off trails; sensitive habitat); (2) vastly increased docent/ranger educational program funded by Event Authority; (3) guided educational programs that provide transportation to various sites of cultural and environmental significance throughout the park; and (4) emphasis on the significance and importance of the Golden Gate Biosphere Reserve.*

Response: The EA's Section 4.7- Visitor Use and Experience addresses the understanding of the significance of the park.

PN8003 - Objective: Ensure Adequate Communications (NPS-10)

Concern ID: 34463

CONCERN STATEMENT: *A high level decision maker to speak for each the agencies and event sponsor, starting now, to work through the many issues the DEIR has raised over a wide array of important subjects. Communications must not be left to bureaucrats and corporate functionaries. If communications are found to be floundering in bureaucratic or corporate entities prior to the Event, then the Park Service must establish a date on which the warning shot is fired into the air, whereupon the Park Service tells the various parties, and the international media, that the Event is now in jeopardy unless the following steps are taken by the following time frame. This would be a time frame which would still enable the Event Authority and Agency decision makers to come directly to the table, work through all the stumbling blocks, and craft an acceptable final agreement protective of the Park Service and the lands and waters under its jurisdiction.*

Response: Comment noted.

PN8004 - Objective: Cost Recovery (NPS-8)

Concern ID: 34464

CONCERN STATEMENT: *Prior to the Event in 2012, funds must be put in escrow in the amount of twice the anticipated total damage to the Parks through and including 2013. This will ensure adequate funds will actually be available to repair damages, which will inevitably occur, to handle unexpected damage, to restore the Park to a condition comparable to or better than pre-Event status.*

Response: Comment noted. Specific financial arrangements are beyond the scope of this EA. Cost

recovery is, however, a stated objective of the NPS, as noted in Chapter 1 – Purpose

PN8005 - Objective: Maintain Resident, Visitor Access (NPS-7)

Concern ID: 34465

CONCERN STATEMENT: *The plans outlined in the Project Description, EIR, People Plan and Visitor Estimates do not ensure that access and use will be maintained for the current user group but rather provides plans that will undoubtedly disrupt and likely restrict use by the primary users. Ensure transportation access by designating certain entrances and access times which will need to be monitored by appropriate law/traffic enforcement. Selected parking spaces will need to be made available.*

Response: Park access has been addressed in relevant EA sections (i.e., 4.10 Transportation and 4.7 Visitor Use and Experience).

PN8006 - Objective: Meaningful Association Between Event & Park (NPS-2)

Concern ID: 34466

CONCERN STATEMENT: *NPS should discuss with the Event Authority and advise ESA as to the specific measures that will be taken to ensure that there is a meaningful association between the event and the park.*

Response: Potential impacts to park resources and values have been identified during preparation of the EA. Protection measures identified in Chapter 2 – Alternatives provide further detail on the association between the event and park.

PN8007 - Objective: Minimize Impact to Park Resources (NPS-4)

Concern ID: 34467

CONCERN STATEMENT: *Impacts to park resources and values can be minimized by ensuring that vendors comply with park standards for cleanliness, especially where it comes to correct disposal of any and all trash associated with their services; no amplified sound after 10pm; compliance with the dark night standards after 10 PM; and no fireworks during bird nesting season.*

Response: Potential impacts to park resources and values have been identified during preparation of the EA and presented through protection measures in Chapter 2 - Alternatives.

PN8008 - Objective: Minimize Impact to Env., Maritime Commerce, Public Use, etc. (USCG-3)

Concern ID: 34469

CONCERN STATEMENT: *All marine vessels in any way connected with the event should meet the most stringent environmental standards. A primary objective of all the agencies involved, USCG, NPS, and the US Army Corp of Engineers is to avoid or mitigate impact on the environment and select the least environmentally damaging practice. The AC34 has not provided plans that meet these objectives. It is imperative that the NEPA process ensure that these objectives are followed through on. Multi-million dollar yacht racing cannot occur at the expense of bay's valuable natural resources.*

Response: Potential marine vessel impacts have been addressed in the EA's relevant sections (i.e., Section 4.2 - Hydrology and Water Quality and 4.3 - Air Quality). Protection measures are to ensure that the cited objective is met.

PN8009 - Objective: Convenient & Affordable Multimodal Access (NPS-6)

Concern ID: 34470

CONCERN STATEMENT: *We are concerned about the ability of the event organizers to provide sufficient transit options to enable people from every part of San Francisco to actually reach (and leave) the national parkland primary and secondary viewing areas in a reasonable amount of time; the potential for overcrowding, people being turned away from these venues, and the availability of transit to alternative viewing locations; and whether the venue areas will become an attractive nuisance after 6pm.*

Response: Transit needs have been evaluated in Section 4.10 Transportation of the EA. NPS will work with relevant transit authorities to ensure that any transit issues resulting from the event are minimized.

PN8010 - Objective: Spectator & Visitor Experience (NPS-1)

Concern ID: 34471

CONCERN STATEMENT: *We are concerned about potential impacts to non-event related volunteer and recreational user access during the events; their effect on volunteer and recreational programs; and how those impacts will be mitigated.*

Response: Such potential impacts have been addressed in the EA's protection measures in Chapter 2 – Alternatives and relevant sections (i.e., 4.7 - Visitor Use and Experience, 4.12 - Park Operations & Facilities)..

PN8011 - Objective: Emphasize Sustainability (NPS-9)

Concern ID: 34473

CONCERN STATEMENT: *Identify the specific components of "Sustainability", who will be the target of that message, and how it will be communicated. We assume these will include at a minimum: energy use and conservation, solid waste management and recycling, water conservation, local food preference for concessions, minimization of carbon footprint (specify how this will be done), and education of race organizers, participants, and spectators on the basics of "sustainability" as defined here.*

Response: Sustainability has been addressed in the protection measures listed in Chapter 2 – Alternatives.

PN8012 - Objective: Vessel Compliance (USCG-2)

Concern ID: 34474

CONCERN STATEMENT: *Street Closures in the northern waterfront may prohibit access to the DC and SERC. Access mitigation plans have not been developed yet. Inter-Agency Access Plan is inadequate under NEPA case law.... Coast Guard Objectives are clearly stated as "Ensure safety of the Event and Ensure participating vessels comply with appropriate safety, security, and environmental regulations." Without an appropriate Access Plan it is impossible to meet these objectives. We fully appreciate the time sensitivity of certifying the AC34 and the concerns with preparing an Access Plan that would encompass the input of numerous agencies and municipalities. However, time constraints are not an acceptable reason for diminishing the public process. We are willing to work with the appropriate authorities to help expedite an Access Plan that meet all Coast Guard safety requirements, America's Cup goals and shares public access.*

Response: Any event-related waterfront access limitations have been addressed in the protection measures listed in Chapter 2 – Alternatives and are consistent with USCG and NPS stated project objectives and explained as such in the EA.

PN8014 - Objective: Minimize Impact to Park Assets (NPS-5)

Concern ID: 34475

CONCERN STATEMENT: *Because a high percent of the anticipated visitors will be directed to National Parklands for the best, most expansive views of AC34, the parks will sustain great stresses on their resources; humans, natural, cultural and irreplaceable historic resources. To ensure adequate preventative measures are put in place prior to the Events, the Event Authority must provide funds, in advance to the Park Service, to do preventative work and support supplementing staff as required by the Park Service.*

Response: Comment noted. Specific financial arrangements are beyond the scope of this EA. However, NPS has identified cost recovery as a stated objective, as discussed in EA Chapter 1— Purpose and Need.

PN8015 - Objective: Be consistent with public interest factors.

Concern ID: 34476

CONCERN STATEMENT: *TIRN supports this objective and urges USACE to hold public hearings and meetings on the permitting process in the evenings when working people who may be interested have the opportunity to participate.*

Response: Comment noted.

PO4000 - Park Operations & Facilities: Impact Of Proposal And Alternatives

Concern ID: 34477

CONCERN STATEMENT: *We are concerned about the protection and future condition of numerous amenities at Golden Gate Overlook, Crissy Field, and Crissy Field Overlook, including: pathways, bridges, picnic areas, plaques, restrooms, and other facilities and infrastructure.*

Response: Potential impacts to park resources (natural or otherwise) have been evaluated in the appropriate EA sections (i.e., 4.7 - Biological Resources, 4.12 - Park Facilities & Operations, etc.). Any protection measures needed to ensure the integrity of these resources have been identified during the process of preparing those sections.

RE4000 - Recreation: Impact of Proposal and Alternatives

Concern ID: 34478

CONCERN STATEMENT: *Consider the impacts to recreational users of Aquatic Park from the proposed displays, video barge, concessionaires, and associated crowds.*

Response: Such impacts have been addressed in the EA's Section 4.7 Visitor Use and Experience.

Concern ID: 34479

CONCERN STATEMENT: *Evaluate impacts of event on non-motorized recreational users of the Bay, including: swimmers, boaters, kiteboarders, and windsurfers.*

Response: Such impacts have been addressed in the EA's 4.7 Visitor Use and Experience section.

Concern ID: 34480

CONCERN STATEMENT: *We are concerned about how the loss of recreational access to Crissy Field, Aquatic Park, and other areas will be mitigated.*

Response: Such impacts have been addressed in the EA's 4.7 Visitor Use and Experience section.

Concern ID: 34481

CONCERN STATEMENT: *It is assumed that during races restrictions on maritime traffic and airspace would be required. Yet there has been no reference to restrictions on swimmer traffic. Further, AC34 is deficient in that it fails to specify what "period of time before and after" each race would carry such restrictions.*

Response: Impacts to swimmers have been identified in the EA's protection measures through the establishment of a non-motorized zone for swimmers extending out from the shoreline. Hours

of limitations have been identified in Section 4.7 Visitor Use and Experience.

SE4000 - Socioeconomics & Environmental Justice: Impact of Proposal and Alternatives

Concern ID: 34483

CONCERN STATEMENT: *The EA should acknowledge the economic impact of the project on Trust-funded facilities and operations. Increased demand for law enforcement, fire protection, and emergency medical services would have economic impacts to the Trust related to the temporary improvements and spectators at Crissy Field.*

Response: Such impacts have been addressed in Section 4.12 Facilities and Operations of the EA.

Concern ID: 34484

CONCERN STATEMENT: *Public assets such as Fort Baker should not be used for private functions that prohibit public access. If NPS considers special use permits for AC events, then it must include public access and environmental justice mitigations to ensure that the community and the environment are not exploited for the benefit of private interests. For example, any high-end event must provide a representative percentage of free tickets to low-income people of color and other members of the public across the broad spectrum of the San Francisco Bay Area's socioeconomic profile. Public assets should not be made available to the wealthy and to international corporations without also equally benefitting the public.*

Response: Comment noted. Restrictions on private events on NPS lands are described in Chapter 2 – Alternatives.

Concern ID: 34485

CONCERN STATEMENT: *GGBHTD is concerned for bridge traffic, trans-bay bus routes that pass through/near the viewing areas, and potential disruptions to ferry routes and schedules. There could be cost-related impacts associated with route & schedule disruptions.*

Response: Such impacts have been addressed in the EA's Section 4.10 – Transportation, 4.14 – Maritime Navigation and Safety, and 4.13 –Socioeconomics sections.

SN4000 - Soundscape & Noise: Impact of Proposal and Alternatives

Concern ID: 34486

CONCERN STATEMENT: *Consider the impacts to people and wildlife from event-related, low-flying aircraft. At a minimum, NPS and USCG should ensure that the project sponsors are required to fly above 1,000 feet AGL, either through the permit or other policy or regulatory means.*

Response: Such impacts and the proposed restriction have been addressed in Section - 4.8 Soundscape and Noise and 4.7 Biological Resources of the EA.

Concern ID: 34487

CONCERN STATEMENT: *AC34 venues, such as the Hospitality/Exhibition/Media site adjacent to the St. Francis Yacht Club and Marina will draw crowds (with related bus and truck traffic), create construction noise, and use amplified sound, generators, and media equipment. Experience has shown that amplified sound from this area is heard inside the Crissy Field Center. In addition, the constant westerly wind at Crissy Field carries sound from the airfield to the Center location at East Beach. Race broadcast plans also call for the use of three helicopters during races. Questions that need to be addressed in the EA: ??When will studies occur that test for noise impacts on this school location as a "sensitive receptor"? What restrictions will there be on helicopter flights near this school center? What assurance is there that the Center will be able to continue offering quality programs unimpeded by noise and other disruptions?*

Response: Such impacts have been addressed in Section 4.8 Soundscape and Noise FAA has been consulted regarding aircraft restrictions.

Concern ID: 34488

CONCERN STATEMENT: *At a minimum, the DEIS should analyze specifics about potential firework displays, including times of year, location, potential for disturbance on GGNRA lands, potential for noise to carry, and toxic or trash issues related to firework displays. The DEIS should also analyze whether there will be additional spectator-related impacts due to fireworks (e.g., some spectators may be drawn to the fireworks that might have not come to observe the race; policing spectators at night will likely be more difficult, resulting in potentially more impacts to sensitive areas in the GGNRA). Under no circumstances should fireworks be lit at or near Crissy Field, Alcatraz Island, or Angel Island, each of which is home to sensitive wildlife species that are typically spared nighttime disturbances. Fireworks and night lighting had a negative impact on nesting and roosting birds on Alcatraz and should not be permitted in any of the nesting and roosting areas. See www.prbo.org/refs/files/11957_Acostaetal.2008.pdf*

Response: Such impacts and the proposed restrictions have been addressed in the EA's Section 4.8 Soundscape and Noise and Section 4.5 Biological Resources of the EA.

SU4000 - Sustainability: Impact of Proposal and Alternatives

Concern ID: 34489

CONCERN STATEMENT: *Sustainability is listed as a topic for the EA. Because this term has taken on so many meanings in different contexts, MCL requests that the EA identify the specific components of "Sustainability." We assume these will include at a minimum: energy use and conservation, solid waste management and recycling, water conservation, local food preference for concessions, minimization of carbon footprint (specify how this will be done), and education of race organizers, participants, and spectators on the basics of "sustainability" as defined here. We urge the federal agencies involved in preparation of the EA to promote behaviors that will conserve resources in all respects.*

Response: Sustainability has been addressed in Chapter 1 and 2 of the EA.

Concern ID: 34490

CONCERN STATEMENT: *The DEIS should identify the potential impacts from additional trash, food waste, and other refuse likely to be introduced to the site due to race-related activities and the increase in spectators. A specific trash management plan must be identified and fully funded. The potential for impacts from trash on terrestrial and marine wildlife should be analyzed.*

Response: Such impacts have been addressed in Section 4.7 - Visitor Use and Experience of the EA.

TR4000 - Transportation: Impact of Proposal and Alternatives

Concern ID: 34491

CONCERN STATEMENT: *The EA should consider the cumulative effects of the AC34 event combined with the Doyle Drive reconstruction project. Doyle Drive reconstruction efforts are affecting conditions in the Presidio, particularly traffic and parking conditions, in addition to pedestrian and bicycle circulation. The Doyle Drive reconstruction project will still be underway in both 2012 and 2013. The cumulative effects of event-generated traffic and transportation management strategies should be considered in the context of the Doyle Drive reconstruction project.*

Response: Such impacts have been addressed in Section's 4.10 - Transportation and the cumulative impacts sections.

Concern ID: 34492

CONCERN STATEMENT: *The NEPA analysis should consider the potential impacts associated with the operation of Golden Gate Transit ferry service as well as increased frequency of service from the Red & White Fleet, Adventure Cat, Oceanic Society, and other major and long-term private charter operations on San Francisco Bay.*

Response: Such impacts have been addressed in Section 4.10- Transportation and 4.13 - Socioeconomics of the EA.

Concern ID: 34493

CONCERN STATEMENT: *We are concerned about whether there is sufficient parking for large numbers of AC34 spectators, as well as employees, customers, visitors, and residents of West Crissy Field and Presidio businesses, organizations, and homes.*

Response: Such impacts have been addressed in Section 4.10 - Transportation of the EA.

Concern ID: 34494

CONCERN STATEMENT: *Access to the Center and to its program sites at Crissy Field would be adversely affected. Most underserved community users of the Center's summer programs arrive by MUNI, school buses, or chartered buses; Center staff members drive, bicycle, or use public transportation. Summer Camp students (June through early August) typically are dropped off by private automobile at between 8 and 9 a.m. and are picked up between 3 and 5 p.m. The Center's site design includes a special pick-up and drop-off lane to provide a safe location for children to enter and exit vehicles. Large numbers of spectators, road closures, and traffic congestion raise concerns about safe access to the Center for the students and staff.*

Response: Such impacts have been addressed in Section 4.10 - Transportation and 4.13 - Socioeconomics of the EA.

Concern ID: 34495

CONCERN STATEMENT: *Access for staff, visitors, and delivery trucks to Crissy Field and Presidio businesses and organizations must be maintained throughout the event activities.*

Response: Access needs have been analyzed in Section 4.10 - Transportation of the EA.

Concern ID: 34497

CONCERN STATEMENT: *Conzelman Road and other roads on the Marin Headlands could also have a capacity challenge. Monitoring and diversion of excess traffic should be enforced on important race days. What contingency plans will be imposed if crowds exceed the safe capacity?*

Response: Such concerns have been addressed in Section 4.10 - Transportation of the EA.

VL4000 - Visual Resources & Lightscape: Impact of Proposal and Alternatives

Concern ID: 34498

CONCERN STATEMENT: *Any blocked views from the Bay Trail should be analyzed and discussed.*

Response: Such concerns have been addressed in Section 4.9 - Visual Resources of the EA.

Concern ID: 34499

CONCERN STATEMENT: *Evaluate the visual impacts of the jumbotron, including Bay view obstruction, screen vibration and glare, and describe contingency measures for handling operational difficulties, including disposal if it does not operate properly.*

Response: Such impacts have been addressed in Section 4.9 - Visual Resources and 4.7 - Visitor Experience of the EA.

VR4000 - Vegetation And Riparian Areas: Impact Of Proposal And Alternatives

Concern ID: 34500

CONCERN STATEMENT: *Specific data for any native plants that may be removed or otherwise impacted should be provided: the plant species, the number of plants, for smaller species the area to be impacted, status of the species and the location of the proposed removal or risk of destruction. Other than recommending pre-project surveys for nesting birds, the DEIR proposes no mitigations*

for ground disturbance or tree removal, nor is information about possible tree removal provided. We strongly recommend that GGNRA not permit the removal of any native trees, riparian, chaparral, grasslands or other native habitats. Even for areas where no construction would occur, protection should be assured.

Response: Such impacts and associated mitigation have been addressed in Section 4.6 - Biological Resources of the EA.

Concern ID: 34501

CONCERN STATEMENT: *Endangered Plant Protection is promised by project sponsors, however, the strategy that would be used was not defined. The EA should address effective ways endangered and other native plants should be protected - including those on the Marin Headlands (on both sides of the GG Bridge), Fort Baker and Cavallo Point, Angel Island, Crissy Field and marsh, and the Tiburon Peninsula. In our experience, the only effective protection would be provided by keeping people out of the habitat.*

Response: Such impacts and associated mitigation have been addressed in Section 4.6 Biological Resources of the EA.

VS1000 - Visitor Conflicts And Safety: Guiding Policies, Regs And Laws

Concern ID: 34502

CONCERN STATEMENT: *The video screen and the propeller driven vessels necessary for its installation present a risk to human and ecological health and safety.*

Response: Such concerns have been addressed in Section 4.11-Maritime Navigation and Safety and 4.7 - Visitor Use and Experience of the EA.

VS4000 - Visitor Conflicts And Safety: Impact Of Proposal And Alternatives

Concern ID: 34502

CONCERN STATEMENT: *Large numbers of spectators, road closures, and traffic congestion raise concerns about safe access to the Crissy Field Center for the students and staff.*

Response: Such concerns have been addressed in Section 4.10-Transportation and Section 4.7 -Visitor Use & Experience of the EA.

VX4000 - Visitor Use & Experience: Impact of Proposal and Alternatives

Concern ID: 34503

CONCERN STATEMENT: *The use of a video display in this natural setting would obscure views of the Bay and Golden Gate Bridge, and would increase sound and light pollution. There is also no restriction or prohibition of commercial or advertising use, such as advertising of soft drinks, luggage or other non-racing content. People go to Aquatic Park to escape the barrage of commerce, not to see and hear televised advertising... As a federally protected recreation area, the addition of yet more commercial operations into one of the few areas where this does not occur will significantly detract from the quality and character of the Park.*

Response: Such impacts have been addressed in development of the alternatives and are discussed in Sections 4.9 - Visual Resources and 4.7 - Visitor Use and Experience of the EA.

Concern ID: 34504

CONCERN STATEMENT: *The EA should discuss the impact of the project on the existing visitor experience in Area B. The EA should identify specific, measurable management objectives related to the visitor experience, and assess how much impact can be tolerated before management intervention is required. The EA should determine what visitor experience conditions would warrant the Trust to use its discretionary authority to impose traffic restrictions and public use limits (see 36 CFR 1001.5). Mitigations to avoid adverse impacts on desired visitor experiences, to include conducting visitor information and education programs, separating conflicting uses*

by time or location, and issuing permits and reservations, should be identified. Monitoring of AC34 visitor levels should be required to address unacceptable impacts to the visitor experience.

Response: Such impacts and management measures have been addressed in Section 4.7 Visitor Use and Experience and Section 4.10 Transportation of the EA.

Concern ID: 34505

CONCERN STATEMENT: *Regarding visitor use and experience, the EA should evaluate: (1) the nature and scale of entertainment proposed for Crissy Field; (2) whether it is appropriate for a national park; (3) whether concerts are proposed during the night; (4) how the placement of a stage, amplified sound, and concessions would impact the regular enjoyment of Crissy Field users and park neighbors; (5) whether there will be a charge for seating, and if so, who will determine the price and who will benefit from the revenue; (6) who will determine and the provider and content of food concessions, whether there will be alcohol sales, and who will benefit from the food and alcohol sales; and (7) how these activities will comply with the goals of the national park and the 1999 Crissy Field MOU with the NPS and the Evelyn and Walter Haas, Jr. Fund?*

Response: The federal team has considered the commenter's suggestions during preparation of the EA's Section 4.7 - Visitor Use & Experience section and other relevant sections of the EA.

WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives

Concern ID: 34508

CONCERN STATEMENT: *We are concerned about the potential for boat strikes with marine mammals, rafting birds, and other wildlife.*

Response: Such impacts have been addressed in the EA's Section 4.5 - Biological Resources and Section 4.11 Maritime Navigation and Safety.

Concern ID: 34509

CONCERN STATEMENT: *Protect bird colonies on Alcatraz Island, including from impacts associated with private events on the island.*

Response: Such impacts have been addressed in the EA's Section 4.5 - Biological Resources.

Concern ID: 34510

CONCERN STATEMENT: *While GGAS appreciates the proposed offshore buffer for motorized craft (Scoping Document, at -4-5), we remind the Agencies that the primary concern for impacts to sensitive species and habitats at Crissy Field will come from on-shore spectators. The off-shore buffer does not in any way diminish or mitigate for those shore-based impacts. Moreover, the DEIS should analyze the basis for the proposed 300-foot buffer. What scientific evidence is available to demonstrate that 300 feet constitutes an adequate buffer? Also, GGAS believes that the buffer should include all watercraft, not just motorized crafts. This is especially important given the likelihood that many of the spectator boats will be sail-driven rather than primarily motorized craft.*

Response: Commenter's concerns have been addressed in the EA's Chapter 2 - Alternatives and Section 4.5 - Biological Resources.

Concern ID: 34511

CONCERN STATEMENT: *Consider the extent and duration of the event's impacts to migratory, nesting, and breeding birds and their habitats resulting from event activities, including: crowds, spectator vessels, private events on Alcatraz Island, and aircraft. Duration should also include pre-event preparation activities, and post-event cleanup activities.*

Response: Such impacts have been addressed in the EA's Section 4.5 - Biological Resources.

WQ4000 - Water Resources: Impact Of Proposal And Alternatives

Concern ID: 34513

CONCERN STATEMENT: *Invasive Marine Species are a significant concern. The potential for introduction of non-native species from hull fouling, anchor chains, anchors, bilge water, drains and other means from visiting boats would be exacerbated by the increase in the numbers of boats. The DEIR recommendations for dealing with this potential impacts include regular vessel maintenance, antifouling paints, frequent hull inspections and maintenance Marine Species Control Plan. Most of these measures would have to occur prior to entering the Bay. Is there some plan or means of checking to determine that the necessary maintenance was performed? The Marine Species Control is not sufficiently described to enable evaluation of its adequacy.*

Response: Measures necessary to minimize impacts to water quality, including the introduction of invasive species, have been addressed in the EA's Section 4.2 - Water Quality.

Concern ID: 34514

CONCERN STATEMENT: *Water Quality Degradation from violations of water quality standards or waste discharge requirements could result from dredging, discharges, bilge water discharges, oily water discharges, ballast water discharges, hazardous material discharges, sewage discharges and littering of bay waters from race related and spectator boats and on-land littering from other uses. The proposed mitigation for these impacts is a Visitor Information Packets that would include relevant restrictions and laws. This mitigation is not adequate to reduce these potential impacts to less than significant levels.*

Response: Such impacts have been addressed in the EA's Section 4.2 - Water Quality. The adequacy of the cited plans have been evaluated during preparation of that section.