

Response to Comments

Response to Comment C-1. The carbon monoxide (CO) hot spot modeling analysis revealed no potential violations of federal or state CO standards. In addition, no violations of federal or state CO standards have been detected in the San Francisco Bay Area since 1991. Consequently, there is no requirement to propose mitigation measures related to ambient CO conditions. Similarly, there are no indications that normal residential, commercial, or office development would create any unusual sources of hazardous air pollutants requiring special mitigation measures. Furthermore, the Navy will not have any authority over reuse activities and thus is in no position to impose mitigation measures related to the types or intensities or reuse activities. EPA and the California Air Resources Board have sole jurisdiction to regulate vehicle fuel composition and resulting emissions of hazardous air pollutants from vehicle traffic.

Response to Comment C-2. No significant air quality problems have been identified for either closure or reuse of NSTI, so there is no requirement to propose any air quality mitigation measures. As noted previously, the Navy will have no authority or responsibility with respect to reuse of NSTI and is thus not in a position to impose mitigation measures.

Response to Comment C-3. EPA and the California Air Resources Board have sole jurisdiction over the composition of vehicle fuels and the regulation of vehicle emissions. Unlike the NASA example cited in the comment, the Navy is disposing of NSTI property with no operational responsibility. The Navy will have no authority or responsibility over construction contracts or actual reuse activities, so it is not in any position to impose specific mitigation measures on construction associated with reuse activities. The designated property recipient will be required by law to ensure that appropriate construction-related mitigation measures are imposed.

Response to Comment C-4. The Navy has conferred with FHWA regarding the transfer of land for the SFOBB and the relationship of this transfer to the disposal and reuse and NSTI. (FHWA has been added to the list of agencies contacted during preparation of the EIS.) FHWA was not asked to be a cooperating agency for this EIS. The SFOBB realignment and the disposal and reuse of NSTI are separate actions, and neither the Navy nor the FHWA are under obligation to include the other as a cooperating agency in the preparation of their respective EISs. FHWA is not regarded as having special expertise or jurisdiction warranting inclusion as a cooperating agency because the SFOBB is operated by Caltrans and all NSTI lands transferred to FHWA were subsequently conveyed to Caltrans.

Response to Comment C-5. As assumed in the EIS, some dredging will occur as part of reuse, but no specific development proposal has been completed at present, so it is not possible to determine the extent and location of any future dredging or to evaluate specific impacts. Regardless of who seeks authorization for dredging, such operations will be required to comply with the permitting requirements of the US Army Corps of Engineers and to be consistent with the LTMS. The noted text in chapter 2 has been revised to read as follows:

"[t]he exact location and amount of potential dredging is not known at present and therefore, this EIS can necessarily evaluate potential impacts from dredging in only a programmatic general way."

The Navy completed a remedial investigation of offshore sediments in 2001 and addressed the potential ecological risk from contaminants at the former Clipper Cove skeet range (immediately east of the marina), stormwater outfalls, and an area on the northwestern shoreline of Treasure Island. Under this investigation, no chemicals were found at levels that would pose a risk to aquatic and avian receptors, and no further investigation or action was recommended. The study did note that sediment dredging near the former Clipper Cove skeet range could disrupt and resuspend lead shot on the sediment surface.

Response to Comment C-6. An inventory of all potential sources of PCBs was completed in 1995. Since that time, all potential sources of PCB contamination have been removed for NSTI, including out of service or closed hydraulic equipment. IR Site 03 is an area immediately adjacent to an electrical substation where transformers may have been placed or repaired in the past. IR Site 03 was closed with DTSC approval in 2002.

Response to Comment C-7. Based on the 1995 inventory for PCBs, no PCB sources were identified at IR Site 09, which is in the remedial investigation phase. Following completion of the investigation, the potential contaminants and the appropriate course of action will be determined.

No PCB sources were identified at IR Site 01 during the 1995 inventory, and the DTSC granted closure approval on March 20, 2002.

In the PCB inventory completed in 1995, a potential source of PCBs at the old boiler plant (Site 05) was not identified; thus, Navy has determined that no action is required at IR Site 05. Groundwater contamination at IR Site 05 will be investigated as part of measures taken at IR Site 24, which surrounds IR Site 05.

Response to Comment C-8. The nature of material formerly stored at IR Site 12 is unknown, and no records describe the types of operations in the vicinity. The following text has been added to the description of IR Site 12 in section 3.13 of the Final EIS:

Analysis of soil and groundwater samples from the FSU area indicated that PAHs and PCBs were the chemicals of concern. In 2000, all soil in the FSU area containing PCBs at levels in excess of the screening level (1 mg/kg) was excavated to 4 feet (1 m) bgs, except where buildings or other structures, such as transformer pads, impeded access. Indoor air monitoring to evaluate the potential risk posed by vapor intrusion from volatilization of PCBs into buildings is ongoing. Initial conservative estimates from this investigation indicate that PCB volatilization may pose a risk to human health in Building 1100 Unit C.

Response to Comment C-9. There is no indication that methane gas is being released at IR Site 11. Although the site is a former landfill, it appears that the debris placed at this location contained little organic material that would produce methane during decomposition.

Response to Comment C-10. Radon is a naturally occurring gas and is not related to human activities. As described in the EIS, radon screening was conducted at NSTI, and all samples were found to be below US EPA recommended action levels; consequently the Navy does not

1 believe further investigations for radon are warranted. Radiological concerns at NSTI are
2 limited to past decontamination training conducted at IR Site 02. The radiological material used
3 in this training had a short half-life and would no longer be found at the site. Radiological
4 concerns were not part of the remedial investigation at IR Site 02. The Navy has been gathering
5 data on potential radiological concerns as part of its ongoing investigations at NSTI but has
6 found none.

7 **Response to Comment C-11.** No radiological decontamination is known to have occurred at
8 NSTI, where radiological concerns are limited to those described above in response to comment
9 C-10. The Navy did conduct radiological decontamination at Hunters Point Naval Shipyard,
10 which is addressed in the CERCLA process for that facility.

11 **Response to Comment C-12.** The environmental investigation and remediation at NSTI is
12 being carried out pursuant to and in accordance with the provisions of CERCLA. The CERCLA
13 process is considered to be the functional equivalent of the NEPA process, including extensive
14 opportunities for public involvement. In addition, the remedial process is a rapidly evolving
15 program and subject to frequent changes. As a result, the remedial process under CERCLA is
16 summarized in section 3.13 of the EIS, but details of investigations, results of sampling, and
17 mapping of contamination are not included. Detailed information on environmental
18 investigation and remediation can be obtained through the CERCLA staff in the Navy's BRAC
19 Operations Office, as noted in section 3.13.3 of the EIS. The Navy is committed to cleaning up
20 each site according to applicable laws and regulations and to levels appropriate to the proposed
21 land use to ensure protection of public health and safety.

22 **Response to Comment C-13.** Please see response to comment C-12, above, regarding including
23 additional information on CERCLA activities in the EIS.

24 **Response to Comment C-14.** Navy agrees that pollution prevention is an important issue. The
25 federal action evaluated in the EIS is the disposal of federal property, and the Draft EIS
26 addresses pollution prevention in the context of fugitive dust control measures for air quality
27 (section 4.6), minimizing impacts to water quality (section 4.10), and proper remediation and
28 disposal of potentially hazardous materials (section 4.13). Navy may require specific
29 mitigations be in place prior to conveying the property but will have no authority or
30 responsibility over actual reuse activities. Consequently, Navy is not in a position to impose
31 mitigation measures for pollution prevention associated with reuse. Considering that the
32 proposed action is the disposal of federal property, additional mitigation measures beyond
33 those included in the Draft EIS do not appear to be warranted. Navy believes that the
34 appropriate vehicle to identify measures associated with reuse would be the City and County of
35 San Francisco's NSTI reuse EIR in compliance with CEQA, not the Navy's EIS.

36 Executive Orders 13101 ("Greening the Government Through Waste Prevention, Recycling, and
37 Federal Acquisition," 9/14/1998), 13148 ("Greening the Government Through Leadership in
38 Environmental Management," 4/21/2000), and additionally, 13123 ("Greening the Government
39 Through Efficient Energy Management" 6/8/1999) would apply only to the federal action, and
40 not to activities associated with reuse. Navy assumes that state and local regulations would

- 1 provide similar pollution prevention regulatory guidance to the City and County of San
- 2 Francisco for all reuse activities.
- 3



Gray Davis
GOVERNOR

June 27, 2002

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
INTERIM DIRECTOR

Timarie Seneca
U.S. Navy
1230 Columbia St. Suite 1100
San Diego, CA 94066-0720

Subject: Disposal and Reuse of Naval Station Treasure Island
SCH#: 2002052061

Dear Timarie Seneca:

The State Clearinghouse submitted the above named Draft EIS to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 26, 2002, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures

cc: Resources Agency

State Clearinghouse Data Base

LETTER D

SCH# 2002052061
Project Title Disposal and Reuse of Naval Station Treasure Island
Lead Agency U.S. Navy

Type EIS Draft EIS
Description This environmental impact statement (EIS) evaluates the potential impacts on the natural and human environment that could result from Navy disposal of surplus federal properties within NSTI and subsequent reuse of those federal properties. NSTI is made up of dry and submerged lands of both Treasure Island and portions of Yerba Buena Island in San Francisco, California.

Lead Agency Contact

Name Timarie Seneca
Agency U.S. Navy
Phone 619-532-0995 **Fax**
email
Address 1230 Columbia St. Suite 1100
City San Diego **State** CA **Zip** 94066-0720

Project Location

County San Francisco
City San Francisco, Oakland
Region
Cross Streets
Parcel No.
Township 1S **Range** 5W **Section** **Base** . MTDIABLO

Proximity to:

Highways 101
Airports
Railways
Waterways San Francisco Bay
Schools San Francisco United School District
Land Use Military Installation

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Coastal Zone; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Boating and Waterways; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; California Highway Patrol; Caltrans, District 4; Caltrans, Division of Transportation Planning; Air Resources Board, Major Industrial Projects; Integrated Waste Management Board; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; State Lands Commission

Date Received 05/13/2002 **Start of Review** 05/13/2002 **End of Review** 06/26/2002

- 1 **Response to Comments**
- 2 **Response to Comment D-1. Comment noted.**
- 3

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Gray Davis
GOVERNOR

July 1, 2002

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
INTERIM DIRECTOR

Timarie Seneca
U.S. Navy
1230 Columbia St. Suite 1100
San Diego, CA 94066-0720

Subject: Disposal and Reuse of Naval Station Treasure Island
SCH#: 2002052061

Dear Timarie Seneca:

The enclosed comment (s) on your Draft EIS was (were) received by the State Clearinghouse after the end of the state review period, which closed on June 26, 2002. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2002052061) when contacting this office.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

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1 Response to Comments

2 Response to Comment E-1. Comment noted. The Navy has addressed the issues raised in the
3 attached letters.

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Memorandum



Date: June 24, 2002

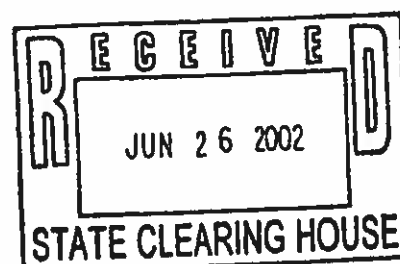
To: State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

From: DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
San Francisco Area

File No.: 335.11425

Subject: ENVIRONMENTAL DOCUMENT REVIEW
AND RESPONSE, SCH #2002052061

*Clear
6-26-02*



The Environmental Document Review and Response for the disposal and reuse of Naval Station Treasure Island (NSTI), SCH #2002052061, has been reviewed. NSTI closed on September 30, 1997, and the Navy is in the process of disposing of the property in accordance with applicable laws and regulations. NSTI is on two islands in San Francisco Bay approximately midway between the shores of the cities of San Francisco and Oakland. Vehicular access to NSTI is via the San Francisco/Oakland Bay Bridge (SFOBB) on Yerba Buena Island. The SFOBB is part of the Interstate-80 (I-80) freeway system and provides an east-west link between the cities of San Francisco and Oakland.

At the time of operational closure, NSTI totaled approximately 1,075 acres of dry and submerged land within San Francisco. Approximately 36 acres were transferred from the Navy to the Department of Labor, 22 acres were transferred to Coast Guard, and 97 acres were transferred to Federal Highway Administration (FHWA), leaving 920 acres for disposal. The Navy can either retain NSTI surplus property in federal ownership (No Action Alternative) or dispose of the property for subsequent reuse.

Reuse Alternative 1 proposes 151 acres of publicly oriented uses. The major publicly oriented development on Treasure Island would be a theme attraction with the potential to attract an average of approximately 13,700 daily visitors. Development would include a 300-room and a 1,000-room hotel with three restaurants and offices. The total number of jobs expected to be generated is 4,482. Alternative 1 proposes 131 acres of residential uses. The total number of housing units associated with this reuse alternative would be approximately 2,850. Traffic generated by Alternative 1 is estimated to be approximately 960 vehicle trips during the weekday AM peak hour, 1,555 vehicle trips during the weekday PM hour, and 1,440 vehicle trips during the weekend midday peak hour.

State Clearinghouse

Page 2

June 24, 2002

Reuse Alternative 2 is similar to Alternative 1, but less extensive. Alternative 2 proposes 151 acres of publicly oriented uses. A theme attraction would draw up to approximately 5,500 daily visitors. Development would include a 700-room and 500-seat amphitheater, and an entertainment and retail center. The total number of jobs expected to be generated is 2,513. Alternative 2 proposes 19 acres of residential uses. 50 existing housing units would remain and approximately 200 new units would be added. Traffic generated by Alternative 2 is estimated to be 385 vehicle trips during the weekday AM peak hour, 775 vehicle trips during the PM peak hour, and 785 vehicle trips during the weekend midday peak hour.

Reuse Alternative 3 represents minor development and existing facilities would be reused. Alternative 3 proposes 121 acres of publicly oriented uses. A theme attraction would draw up to approximately 2,740 daily visitors. Development would include at least one landmark structure up to 100 feet tall, and other new buildings similar in height to existing conditions. The number of jobs expected to be generated is 1,736. Alternative 3 proposes 150 acres of residential uses. The number of housing units associated with this reuse alternative would be approximately 1,100. Traffic generated by Alternative 3 is estimated to be 610 vehicle trips during weekday AM peak hour, 800 vehicle trips during the weekday PM hour, and 770 vehicle trips during the weekend midday peak hour.

The following comment is offered regarding the reuse alternatives:

Regardless of the alternative considered, SFOBB will definitely be adversely impacted by traffic. Westbound SFOBB traffic is controlled at the toll plaza by metering lights. The additional traffic resultant of the NSTI reuse would require the slowing of the metering lights, which would adversely impact traffic on Interstates 80, 580, and 880 in Alameda County. In order to properly manage this amount of traffic and adequately provide the public service required in this general location, it would be necessary to increase in-view patrol during weekday AM and PM peak hours and weekend midday peak hours.

F-1

If you have any questions regarding this memorandum and our comment, please contact me or Lieutenant Don Morrell at (415) 557-1094.



E. C. CHOI, Lieutenant
Acting Commander

cc: Golden Gate Division
Special Projects Section

1 **Response to Comments**

2 **Response to Comment F-1.** Please see response to comment B-4 regarding traffic on the SFOBB
3 and at the SFOBB toll plaza. Additional traffic generated by the proposed action would not
4 require the slowing of the SFOBB metering lights; metering lights are designed to restrict the
5 number of vehicles to get onto the SFOBB. However, these additional vehicles may cause
6 longer vehicle queuing on the approach to the toll plaza. As stated in the response to comment
7 B-4, regardless of the number of vehicles approaching the SFOBB, the operation of the SFOBB
8 would remain the same and, therefore, it is not certain that additional in-view patrols would be
9 required.

10

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Gray Davis
Governor

Department of Toxic Substances Control

Edwin F. Lowry, Director
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721

June 24, 2000

Mnston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Ms. Timarie Seneca
BRAC Operations Office
Southwest Division, Naval Facilities Engineering Command
Code 06CM.TS
1230 Columbia Street, Suite 1100
San Diego, California 92101-8517

DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS), NAVAL STATION TREASURE ISLAND, SAN FRANCISCO, CALIFORNIA

Dear Ms. Seneca:

The Department of Toxic Substances Control (DTSC) has reviewed the DEIS for the disposal and reuse of Naval Station Treasure Island dated May 2002. The DEIS analyzes potential environmental impacts from three reuse alternatives relating to land use, visual resources, socioeconomic, cultural resources, transportation, air quality, noise, biological resources, geology and soils, water resources, utilities, public services and hazardous materials and waste. DTSC's review was limited to sections directly addressing hazardous materials and waste issues. Following are DTSC's comments.

1. Chapter 1, Section 1.2, Overview of NSTI

A fuel service station and munitions storage bunkers were operated by the Navy and should be added to the list of facilities that were formerly located on Treasure Island.

G-1

2. Chapter 1, Section 1.5, Related Studies

The 1997 BRAC Cleanup Plan mentioned does contain a remediation plan and schedule, however, the plan and schedule are out of date and do not reflect the current understanding of the Installation Restoration sites and associated schedules.

G-2

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

Ms. Timarie Seneca

June 24, 2002

Page 2

3. Chapter 3, Section 3.13.1, Hazardous Materials Management

Please see comment number two.

] G-3

4. Chapter 3, Section 3.13.3, Installation Restoration Program (IRP)

The master schedule for NSTI was last updated in 2001 and will be updated annually. The master schedule will be the Appendix D schedule for the NSTI FFSRA.

] G-4

5. Chapter 3, Section 3.13.5, Polychlorinated Biphenyls (PCBs)

IR Site 12 should be added to the list of sites known to have had historical releases of PCBs to soils that are in need of further evaluation and eventual remediation.

] G-5

If you should have any questions regarding this letter, please contact me at (510) 540-3763.

Sincerely,



David Rist
Hazardous Substances Scientist
Office of Military Facilities

cc: Mr. Phillip Ramsey (SFD-8-2)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

Ms. Sarah L. Raker
California Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, California 94612

Ms. Martha Walters
Mayor's Office at Treasure Island
770 Golden Gate Avenue
San Francisco, California 94102

1 **Response to Comments**

2 **Response to Comment G-1.** The facilities listed in section 1.2 are intended to inform the reader
3 of the general types of uses at NSTI, especially with respect to structures that may be part of
4 reuse. Because of the size and complexity of land uses and facilities on NSTI, this list is not
5 intended to be inclusive of all historic uses of NSTI facilities.

6 **Response to Comment G-2.** The BCP has not been updated and, as noted by the commentor,
7 does not reflect the current schedule and remediation plan. As noted in section 3.13.3 of the
8 EIS, current information on remediation plans and schedules are available through the Navy's
9 BRAC Operations Office and in Appendix D of the NSTI FFSRA.

10 **Response to Comment G-3.** Please see the response to comment G-2 above.

11 **Response to Comment G-4.** The text in section 3.13.3 of the Final EIS has been revised to read
12 as follows:

13 Appendix D of the NSTI FFSRA, which provides the submittal schedule for draft
14 primary and secondary documents, was last updated in 2002.

15 **Response to Comment G-5.** The text in section 3.13.5 has been revised to read as follows:

16 Navy has investigated IR sites 03, 12, and 17 for potential PCB contamination. No
17 further action relative to PCBs has been recommended at either site 03 or 17. A removal
18 action for soils containing PCBs at levels in excess of the screening level (1 mg/kg) was
19 conducted in 2000 at IR 12.

20

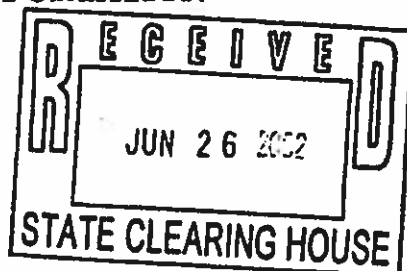
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STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION

P. O. BOX 23680
 OAKLAND, CA 94623-0680
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*Flex your power!
 Be energy efficient!*

June 24, 2002

Clear
6.26.02
 SF-80-7.71 e
 File #SF080104
 SCH #2002052061

Ms. Timarie Seneca
 BRAC Operations Office
 Southwest Division
 Naval Facilities Engineering Command
 Code 06CM.TS
 1230 Columbia Street, Suite 1100
 San Diego, CA 92101-8517

Dear Ms. Seneca:

Disposal and Reuse of Naval Air Station Treasure Island - Draft Environmental Impact Statement (DEIS)

Thank you for including the California Department of Transportation (Department) in the environmental review process for the above-referenced project. We have reviewed the DEIS dated May 2002, and have the following comments to offer:

1. Executive Summary – Section ES-3, Disposal and Reuse Process, page ES-3:

The Executive Summary states "The easements impose substantial restrictions on Navy's ability to access and utilize the underlying property. This land is no longer available for transfer by the United States and, as such, is no longer available for community reuse..." It continues, "For that reason, the SFOBB property, including the construction and aerial easements, is not included in the Navy disposal and is therefore, excluded from this EIS."

The Department questions the meaning of these statements since the deeds transferring the land include the provision for terminating the temporary construction easements of several parcels on Yerba Buena Island. The deeds state that "termination shall occur when the State determines that the easements are no longer required for the construction of the seismic safety projects or when the State gives final acceptance to its contractor for work on the seismic safety projects. If requested, the State will prepare, execute and deliver to the Navy deeds to release and extinguish the temporary construction easements." When construction activities on Yerba Buena Island are completed, the State will then relinquish its rights on the temporary construction easement. Further, the deeds also acquired right of way for all three bridge replacement alternatives under consideration for Department's east span seismic replacement project on the SFOBB and the deed also provides for returning any unnecessary right of way to the Navy. Therefore, excluding the portion of Yerba Buena Island currently within the State's temporary construction easement and all the permanent right of way acquired in October 2000, the DEIS ignores the potential reuse of this land.

H-1

2. Section 3.1.3 Surrounding Land Uses, page 3-11:
We suggest that the San Francisco-Oakland Bay Bridge be included in this section, as it is a very important land use on the island. H-2

3. Section 3.3 Socioeconomics, page 3-18:
The analysis in this section relies heavily on the Association of Bay Area Governments (ABAG) Projections 1996 series. Three new Projection Series have been released since the 1996 series (1998, 2000, and 2002). We have found in general that, compared to the more recent Projection Series, the 1996 Projections (which were released toward the end of an economic recession) tend to under-predict future job, population and housing growth in the region. For example, ABAG Projections 2002 estimates a 41% increase in Bay Area jobs between 1990 and 2015 (from 3.5 million to 4.5 million), rather than the 29% job growth for the same period referenced from 1990 on page 3-19 of the DEIS. The most recent Projection Series available, ABAG Projections 2002 should be used and all analysis should be revised accordingly. H-3

4. Section 3.5.1 Roadway Network, second paragraph, page 3-39:
The text states that Figure 3-5 shows "the location of the six ramps and the Caltrans easement across Yerba Buena Island." Figure 3-5 on page 3-40 does not show the Department's easement on Yerba Buena Island. H-4

5. Chapter 4, Introduction, Environmental Consequences, last paragraph, page 4-2:
The Department disagrees with the statement that the "Navy is effectively precluded at this time from taking those actions that are required of it to make temporary construction easements and possible excess property suitable for conveyance." While construction activities on the easement will indeed limit Navy's access to its property, land use planning can proceed. In addition, the transfer did not include right of way for roadway and utility purposes across one parcel. The Navy has identified certain hazardous waste sites in portions of the area previously within the Temporary Construction Easement and in-fee land, and if the Navy requires access from the Department to investigate and/remediate such wastes, it is entitled to such access under the provisions of the land transfer. This means that the Navy can in fact take actions necessary to prepare the land for conveyance. H-5

6. Section 4.5 Transportation - Traffic Analysis Methodology, page 4-34:
The report provides traffic forecasts to year 2010, stating that this is a common benchmark used by the Metropolitan Transportation Commission (MTC) for long-range planning in the region. The MTC currently provides traffic forecasts, based on ABAG Projections 2000, to year 2025. The analysis should take into account the latest planned and programmed transportation improvements assumed in the current MTC travel demand model, and identified by the nine Bay Area counties, Caltrans, and MTC. Traffic projections should at least be provided for the assumed Naval Station Treasure Island build-out year, 2015, and, to be consistent with regional planning efforts, year 2025 traffic forecasts should be developed as well. H-6

7. Section 4.5, Transportation, Significant and Mitigable Impacts, pages 4-36 to 4-58:
Mitigation of the significant traffic impacts identified in the DEIS relies heavily on implementation of the Transportation Demand Management (TDM) measures identified in Chapter 4 & Appendix F. We are skeptical of the ability of these TDM measures to effectively H-7

reduce vehicle demand for the island, particularly since ferry service to and from the island (currently non-existent) appears to play a major role. Since much of the TDM measures depend on adequate funding, it is unrealistic to propose them as mitigation without an established financing plan. H-7

8. Section 4.5, Transportation, Significant and Mitigable Impacts, pages 4-36 to 4-58:
The eastbound on-ramp will be rebuilt with the replacement of the east span. The rebuilt on-ramp will have a significantly improved merge taper, which will increase the on-ramp capacity. We estimate the peak period capacity to be approximately 900-1000 vehicles per hour (vph), which will be able to handle all of the forecasted demands. This additional demand entering the freeway will very likely have a significant adverse impact on freeway operation, particularly during the PM peak period when the freeway operates at capacity. The proposed mitigation should be revised to address the expected impact to the freeway. As part of the mitigation, we recommend implementation of ramp metering which would be operated to maintain capacity flow along the entire length of the bridge. H-8

9. Section 4.5, Transportation, page 4-40:
The DEIS proposes that impacts from the increased traffic for the westside eastbound off-ramp be mitigated with signs directing traffic to the eastside eastbound off-ramp. The analysis estimates that this mitigation would split the demand about evenly between the two off-ramps. We believe that it is unrealistic to expect this amount of traffic shift to occur. It is more likely that most, if not all, of the eastbound traffic destined for Treasure Island will use the westside eastbound off-ramp regardless of the signing. It is more appropriate to assume that no traffic would shift, and develop mitigation measures that would directly address this impact. H-9

10. Section 4.5, Transportation, pages 4-43 to 4-45:
The DEIS describes construction-related impacts as being not significant. However, construction-related vehicles may have a significant impact if they use the bridge during the peak periods due to the currently over-saturated conditions. This should be identified as a potential significant impact with use of water transportation and off-peak vehicle travel as mitigation. H-10

11. Section 4.5, Transportation, Not Significant Impacts, page 4-43:
Under "Other ramp operations (Factor 1)" the DEIS states that there would be no significant queuing impacts because ramp demand would be less than capacity, except for the western westbound on-ramp, the eastern eastbound off-ramp, and the eastbound on-ramp. While this may be true for the ramp operation, it is not a correct assessment of freeway impacts since any increase in on-ramp volume entering the freeway during the peak period in the peak direction would *significantly* impact freeway operation on the bridge and its approaches. This is true because the freeway currently operates at capacity essentially along the entire length of the bridge in the westbound direction during the AM peak period, and in the eastbound direction during the PM peak period. The bridge is the primary bottleneck along this corridor, which means that any additional traffic entering the bridge will result in an increase in traffic congestion and delay. H-11

12. Section 4.5, Transportation, Level of Service, page 4-44:
It appears that the level of service (LOS) for the freeway mainline was determined using speed as the criterion. The accepted methodology in the Highway Capacity Manual is to use density as the criteria for freeway LOS. The analysis should be revised accordingly. H-12

13. Appendix F.2 Socioeconomics:

Since 1990 U.S. Census data shows that the average household size at Naval Station Treasure Island was 3.7, it would seem more appropriate to use this value to represent existing household size, rather than the 3.2 figure based on the average family size in San Francisco assumed in the Presidio reuse plan.

H-1

14. Appendix F.3 Transportation, Table F-7, page F-17:

How were the number of trips derived for specific land uses in each travel analysis zone? Are these based on Institute of Transportation Engineers (ITE) trip generation rates?

H-1.

15. Appendix F.3, Travel Demand, page F-23:

What assumptions were made in "adjusting" the trip generation, trip distribution, and mode split estimates for the various land use alternatives, as well as for auto occupancy factors and vehicle trips to ferry terminals? How was the travel demand information derived for land uses not evaluated for the reuse plan? The basis for these assumptions should be clearly defined.

H-1!

16. Appendix F.3, Trip Generation, page F-23:

It is not clear which ITE Trip Generation Edition was used to derive the number of trips assumed for the various land use categories. The 6th Edition (most recent) is the preferred source of trip generation rates, and should be used in this analysis.

H-16

17. Appendix F.3, Trip Generation, page F-24:

On what basis was it concluded that 40% of the daily and peak-hour person trips in Alternative 1 will consist of internal trips? This key assumption in the analysis requires a much more detailed explanation as to how such a seemingly high percentage of internal trips was derived. Similarly, further explanation is needed as to how the other travel mode percentages (for auto, vanpool, bus and ferry) were derived.

H-17

18. Appendix F.3, Table F-14, Person Trip Generation, page F-31:

The totals of the Retail/Work trip distribution percentages in Table 14 exceed 100%. This should be corrected, along with any part of the analysis that utilized the errant figure.

H-18

19. Appendix F.3, Table F-15, Mode Split, and Tables F-16 & F-17, Average Vehicle Occupancy, page F-32:

What is the justification for assuming that 100% of all internal work and non-work trips, for each land use category, will be made by bus? The mode split percentages assumed here are significantly different than the current average mode split percentages for the region (as is the high vehicle occupancy rate). Detailed justification and documentation supporting such percentages should be provided.

H-19

20. Appendix F-3, Transportation Features Assumed, page F-20:

There is no discussion of the accommodation of bicycles and pedestrians in this DEIS. The Appendix indicates that pedestrian and bicycle facilities would be provided. However, there is no mention how this will be done on Yerba Buena Island, and how this will connect to the pedestrian and bicycle path on the new cast span of the Bay Bridge. These are significant issues

H-21

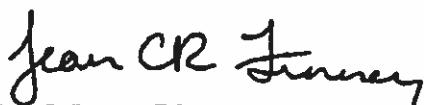
Sancom/DEIS
June 24, 2002
Page 5

that should be addressed. This DEIS needs to indicate how pedestrian and bicycle facilities will be accommodated on Yerba Buena Island, and how they will connect to Treasure Island. The DEIS should also indicate whether the proposed bicycle accommodations will be compliant with the Americans with Disabilities Act.

H-20

We look forward to your response to our concerns. Should you require further information or have any questions regarding this letter, please call Paul Svedersky of my staff at (510) 622-1639.

Sincerely,



JEAN C. R. FINNEY
District Branch Chief
IGR/CEQA

c: Katie Shulte Joung, State Clearinghouse

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Response to Comments

Response to Comment H-1. Please see response to comment B-2 regarding inclusion of the FHWA/Caltrans easements in the EIS analysis.

Response to Comment H-2. The SFOBB was discussed in the Draft EIS under Yerba Buena Island in section 3.1.2 Reuse Plan Area. This discussion has been moved to section 3.1.3 Surrounding Land Uses in the Final EIS.

Response to Comment H-3. Previous projections (ABAG 1996) indicated a job growth rate of 29 percent for the Bay Area, while more recent projections (ABAG 2002) estimate a job growth rate of 39.9 percent growth between 1990 and 2015, with the largest growth occurring in Santa Clara and Alameda counties. Due to the substantial difference in anticipated population and job growth between Projections '96 and Projections '02, data from the ABAG's Projections 2002 was used to update this section. This data also was used to revise the analysis of socioeconomic effects in section 4.3 and the cumulative socioeconomic effects described in section 5.1 Cumulative Assumptions, and section 5.4 Analysis of Cumulative Impacts. The updated information did not alter the conclusions in these sections.

Response to Comment H-4. Figure 3-5 has been revised to show the FHWA/Caltrans easements.

Response to Comment H-5. Please see response to comment B-2 regarding inclusion of the FHWA/Caltrans easements in the EIS analysis. The referenced text has been removed.

Response to Comment H-6. Please see response to comment B-4 regarding updates of traffic projections to year 2025.

Response to Comment H-7. The only access to NSTI is from the SFOBB. The EIS documented existing ramp constraints and current and future traffic conditions and impacts on these ramps and SFOBB mainline. The current vehicular access to NSTI is highly constrained. The only feasible modifications to the ramps are those included in the SFOBB east span project. Other major physical improvements, such as a BART Treasure Island Station, were dropped from consideration. Consequently, the only feasible mitigation measures are TDMs, new ferry services, balancing the ramp volumes, and the creation of a monitoring program that would potentially limit the amount of land use development on NSTI. All of these mitigation measures are presented in section 4.5.1 under Alternative 1, Significant and Mitigable Impacts.

The proposed action evaluated in the EIS is the transfer of federal property. Mitigations for potential impacts associated with reuse are identified and agreed to by the City as part of the transfer agreement. Funding for these measures would be undertaken by the City as part of reuse. State legislation has created a regional Water Transit Authority (WTA) to assist in defining a regional ferry system for the future. Treasure Island is one of the key locations for the initial services.

Response to Comment H-8. Comments on the new eastbound on-ramp on the east side of the tunnel is noted and changes were made in the text. A potential mitigation measure of a metering light is also included. Please see response to comment B-4 regarding traffic impacts on the eastbound on-ramp on the east side of the tunnel.

Response to Comment H-9. Section 4.5 states that the proposed TDM program could reduce the peak-hour vehicle trips by 6 to 12 percent. Consequently, traffic volumes on the eastbound off-ramp on the west side of Yerba Buena Island could be reduced from 535 vehicles to 471-503 vehicles. The capacity of this ramp has been observed to be 500 vehicles per hour. Even with a smaller shift in traffic to the off-ramp on the east side of the island, the impact could be reduced to an nonsignificant level, meaning that drivers would not have to queue on the SFOBB during the PM peak hour. Currently there are no signs to direct vehicles to use the off-ramp on the east side of the island, which is underutilized (approximately 21 percent of the total drivers from the eastbound direction use this ramp).

Response to Comment H-10. As stated in the EIS, a guiding policy of the Draft Reuse Plan (San Francisco 1996e) is to limit truck service and freight delivery to off-peak hours (generally between 10:00 AM and 3:00 PM and after 7:00 PM on weekdays). In addition, construction on NSTI would vary depending on the specific construction activity and schedule for the various components of the development. In addition, construction impacts are generally short term in nature and can be managed through proper phasing, sequencing, and scheduling. Truck ferries could potentially be used to transport construction materials and equipment to accommodate construction activities.

Response to Comment H-11. Table 4-8 of the Draft EIS (now Table 4.5-6 of the Final EIS) presents the freeway SFOBB mainline impacts. It shows that there would be no significant impacts on SFOBB both in the eastbound and westbound directions. For the westbound direction, SFOBB will operate at LOS F condition with or without the redevelopment of NSTI. Traffic operation on the SFOBB westbound direction is controlled by the metering lights at the approach to the SFOBB to ensure a free flow condition of SFOBB. If additional traffic from NSTI would cause traffic speed to slow down on the SFOBB, Caltrans could further reduce the number of vehicles getting onto the SFOBB, which could potentially cause secondary impacts.

Response to Comment H-12. The freeway mainline analysis performed in 1996 (using speed to determine level of service instead of density based on the Highway Capacity Manual 1985) was appropriate at the time it was prepared. Since then the Highway Capacity Manual was modified twice and the current version (2000) recommends the use of density as a measure to determine freeway mainline level of service. While the change of analysis may affect the level of service presented in the Final EIS, it would not affect the proposed mitigation measures.

NSTI is an island that can only be accessed by the six freeway on- and off-ramps from SFOBB. Freeway volumes on SFOBB during AM and PM peak hours from both the eastbound and westbound directions are restricted either because of the metering lights (in the westbound direction) or lane geometry (in the eastbound direction). There is no opportunity to modify the ramp geometry (except the eastbound on-ramp on the east side of the tunnel which will be improved as part of the SFOBB East Span project). Feasible measures for the Disposal and

Reuse of Treasure Island project to mitigate impacts are documented under "Significant and Mitigable Impacts for SFOBB/I-80 Yerba Buena Island Ramps". These mitigation measures include a TDM program, increased bus and ferry services, traffic signage to balance ramp usage, and a monitoring program to ensure the established goals and objectives in the Draft Reuse Plan are implemented. If the results of the monitoring program indicate that significant impacts still occur, either more aggressive TDM and transit improvements must be implemented or additional developments should be delayed until such improvements are implemented.

Response to Comment H-13. The average military household size when NSTI was used solely for military purposes was 3.7 persons. It is assumed in the analysis that the units to be reused would have a slightly smaller household size (3.2 persons per unit) because non-military population densities are less than military. The lower household size (3.2 versus 3.7 persons) also is based on the fact that there would be additional constraining factors to non-military families reusing the area that did not exist for military families: children who might have to be shuttled to a variety of after-school activities, medical appointments, shopping, etc. A slightly lower average household size, therefore, was projected for the reuse of the larger units, using the Presidio Planning Socioeconomic Analysis Report as an estimate for consistency. The higher density for reuse of the existing units, as compared to the new ones (3.2 persons in the reused units versus 2.3 persons in the new units), is based on the larger number of bedrooms/square footage than is common in the Bay Area.

Response to Comment H-14. Analysis presented in the EIS used the ITE rates for only part of the trip generation analysis. Whenever possible, trip generation rates developed by the San Francisco Planning Department were used. When the data was not available from the San Francisco Planning Department, ITE rates were used. The San Francisco Planning Department data were obtained from an extensive survey of a wide range of land uses in 1991 and documented in a report, titled San Francisco Citywide Travel Behavior Survey (CTBS). The key differences between the CTBS and ITE data are that ITE data were mostly obtained from suburban sites, typically in a single-use site, where CTBS data are San Francisco specific and they are mostly in a mixed-use setting. CTBS data have been used for all transportation impact analysis both for individual development projects as well as areawide planning projects, such as the Hunters Point Naval Shipyard EIS/EIR. ITE data were used whenever CTBS data are not available. The assumptions for the trip generation rates are presented in Tables F-8 and F-9 of the Draft EIS (now Tables F-10 and F-11 of the Final EIS).

Response to Comment H-15. Trip generation, trip distribution, and modal split ratios for the EIS were developed by the San Francisco Planning Department as part of the Citywide Travel Behavior Survey. They are presented in Tables F-14 and F-15 of the Draft EIS (now Tables F-16 and F-17 of the Final EIS). Both Tables F-8 and F-9 of the Draft EIS (now Tables F-10 and F-11 of the Final EIS) contain extensive documentation of the assumptions in the footnote.

Response to Comment H-16. As stated in Appendix F, trip generation rates were obtained from City and County of San Francisco sources. Where San Francisco trip generation rates were not available, rates were obtained from ITE version 5.

Response to Comment H-17. The internal trip assumptions are presented in Table F-14 of the Draft EIS (now Table F-16 of the Final EIS). This table presents trip distribution pattern for all land use categories by work and non-work related trips, including internal trips. The Draft EIS generally stated that the Island would be developed as a mixed-use district.

Response to Comment H-18. The percentage of internal work trips for retail in Table F-14 of the Draft EIS (now Table F-16 of the Final EIS) has been corrected to read 10 percent rather than 100 percent.

Response to Comment H-19. The modal split ratios presented in Table F-15 of the Draft EIS (now Table F-17 of the Final EIS) were incorrect and have been modified.

Treasure Island is approximately 0.6 miles by 1 mile, and, therefore, most of the land uses would be within reasonable walking distance to each other, except those located on the perimeter of the Island. The majority of the internal trips would be made by transit, pedestrian, and bicycle modes. This assumption is further supported by that fact that Treasure Island would be designed as a mixed-use island with a wide range of land uses, including residential, office, retail, and recreational uses. It would also be designed to include multimodal transportation modes to facilitate pedestrian, bicycle, and transit use. Key transportation policies from the Draft Reuse Plan include:

- Establish transit and pedestrian-based development on Treasure Island, and
- Establish a multimodal internal circulation system that emphasizes non-auto modes.

Response to Comment H-20. The EIS is a program level document based on the description provided by the City and County of San Francisco in its Draft Reuse Plan. The Draft Reuse Plan stated that pedestrian and bicycle facilities would be provided; however, no specific design was presented. This condition was also stated in the SFOBB East Span Seismic Safety Project EIS (page 4-25 under section 4.2.2 Yerba Buena Island).

The SFOBB East Span Seismic Safety Project EIS states that: "the bicycle/pedestrian path proposed for the Preferred Alternative (Replacement Alternative N-6) and Replacement Alternatives N-2 and S-4 would terminate on the eastern side of Yerba Buena Island. In the final design phase for a replacement alternative, Caltrans would work with the Navy and/or the City and County of San Francisco (San Francisco) to design appropriate path connections to the local roadway network. Caltrans would consult with the Navy and/or other property owners on Yerba Buena Island about their interest in having directional signage installed for path users on the bridge. If consultation results in agreement on the nature and placement of the signs, Caltrans would install the signage. To the extent the Navy and San Francisco believe the SFOBB bicycle/pedestrian path would create excessive demand on Navy/ San Francisco facilities on Yerba Buena Island, Caltrans would limit access to Yerba Buena Island at the request of the Navy and/or San Francisco. Should the Navy or the San Francisco desire Yerba Buena Island access to be specifically directed, limited, or prohibited, Caltrans would work with these agencies to design signage or barriers. Caltrans does not have responsibility or authority for areas of Yerba Buena Island and Treasure Island once path users leave the path on the East Span.

1 "Caltrans and MTC are currently preparing a feasibility study for a possible
2 bicycle/pedestrian/maintenance path from San Francisco across the West Span and a
3 connection around Yerba Buena Island to a path on the replacement East Span. East of the
4 Yerba Buena Island anchorage, the path would continue on elevated structures which would
5 connect to an at-grade path along the south side of Yerba Buena Island, generally along the
6 existing Treasure Island Road, that would then connect to the East Span path. Any future
7 pathway on the West Span and on Yerba Buena Island would be separate project. The East
8 Span path could accommodate connections to a possible path of the West Span."

9

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STATE OF CALIFORNIA - THE RESOURCES AGENCY

GRAY DAVIS, Governor

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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June 28, 2002

REPLY TO: USN020508A

Ron Plaseied, Base Closure Manager
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
SAN DIEGO CA 92132-5190

Re: Draft Environmental Impact Statement for the Disposal and Reuse of Naval Station
Treasure Island, City and County of San Francisco.

Dear Mr. Plaseied:

Thank you for submitting to our office your May 7, 2002 letter and copy of the "Draft Environmental Impact Statement (DEIS) for Disposal and Reuse of Naval Station Treasure Island," a property located in the City and County of San Francisco. The closure of the facility is being done under the direction of the Defense Base Closure and Realignment Act (DBCRA). The 103rd U.S. Congress approved the closure of Naval Station Treasure Island (NSTI) in September 1993. The DEIS seeks to evaluate the potential impacts on cultural resources that could result from Navy disposal of surplus federal properties within NSTI and subsequent reuse of those federal properties. The Navy is considering four alternatives, including a No-Action Alternative, for implementation of the disposal and reuse of the properties on NSTI. The alternatives are detailed in the Executive Summary of the DEIS and in other sections of the document that seek to measure the impacts of the alternatives on the natural and human environment.

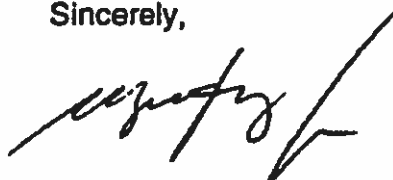
The Navy is seeking our comments on its DEIS in accordance with 36 CFR 800, regulations implementing Section 106 of the National Historic Preservation Act. It has been noted in Sections 3.4 and 4.4 of the DEIS that historic properties on Treasure Island and Yerba Buena Island have been identified and evaluated by the Navy in consultation with our office. A number of these properties have been determined, by consensus, to be eligible for inclusion on the National Register of Historic Places (NRHP). The Navy's identification and evaluation of historic properties on NSTI, as described in the DEIS, appears adequate and meets the standards set forth in 36 CFR 800.4. We will provide comments on the proposed closure and reuse of NSTI once the Navy has selected a preferred alternative and has provided documentation regarding its potential impacts on historic resources.

I-1

LETTER I

Thank you again for seeking our comments on your project. If you have any questions, please contact staff historian Clarence Caesar at (916) 653-8902.

Sincerely,

A handwritten signature in black ink, appearing to read 'Knox Mellon', with a long horizontal stroke extending to the right.

Dr. Knox Mellon
State Historic Preservation Officer

- 1 **Response to Comments**
- 2 **Response to Comment I-1. Comment noted.**
- 3

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SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION

80 CALIFORNIA STREET, SUITE 2800
 SAN FRANCISCO, CALIFORNIA 94111
 PHONE: (415) 382-3800
<http://www.bcdc.ca.gov>

June 26, 2002

Southwest Division
 Naval Facilities Engineering Command
 1230 Columbia Street, Suite 1100
 San Diego, CA 92101-8517

Attn: Ms. Timarie Seneca

and

City and County of San Francisco
 Treasure Island Development Authority
 Treasure Island
 San Francisco, California 94130

Attn: Ms. Ann Marie Conroy

SUBJECT: BCDC Inquiry File No. SF.YB.7120.1, Comments on Draft Environmental Impact Statement For the Disposal and Reuse of Naval Station Treasure Island, State Clearinghouse Number 2002052061

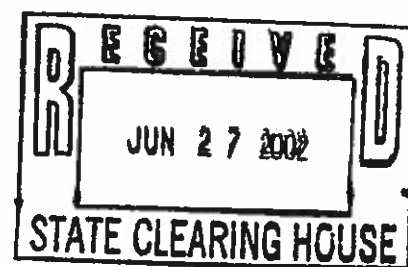
Greetings:

This letter conveys the staff comments on the on Draft Environmental Impact Statement For the Disposal and Reuse of Naval Station Treasure Island (DEIS), State Clearinghouse Number 2002052061, dated May 2002 and received in our office on May 14, 2001. Although the Commission has not had an opportunity to review the DEIS, we trust the following staff comments based on the Commission's law, the McAteer-Petris Act (Act), and the policies of the Commission's *San Francisco Bay Plan* (Bay Plan), will be considered by the United States Navy when preparing the final DEIS for the transfer of Naval Station Treasure Island (NSTI).

The DEIS assesses potential environmental impacts of the disposal and reuse of NSTI from the United States Navy (USN) to the City and County of San Francisco (City) and the potential significant impacts of three proposed reuse alternatives, Draft Reuse Plan Alternative 1, Alternative 2 and Alternative 3. A fourth alternative, no action, assumes no disposal of the property and retention of NSTI by the Navy in caretaker status. The DEIS states that the only significant non-mitigable impact is would occur under alternative 2 and involves the demolition of historic buildings.

Jurisdiction.

On Page 3-4 through 3-6, the DEIS summarizes the Commission's authority under the McAteer-Petris Act, including the *San Francisco Bay Plan* and the *San Francisco Bay Area Seaport Plan* and the federal Coastal Zone Management Act. The discussion of the Commission's jurisdiction and authority is thorough and for the most part accurate with a few minor inaccuracies. The DEIS states, in part that "the the *San Francisco Bay Plan* and the *San Francisco Bay Area Seaport Plan* are the approved local coastal plans for complying with CZMA in San Francisco Bay." This is partially correct. The Commission's approved federal Coastal Management Program does include these plans, among others. The Commission's approved management program includes its laws, the McAteer-Petris Act and the Suisun Marsh Preservation Act, its plans the *San Francisco Bay Plan*, *Suisun Marsh Preservation Plan*, *San Francisco Bay Area Seaport Plan*, *San Francisco Waterfront Special Area Plan*, and other Special Area Plans, and many other documents. The DEIS also states on page



J-1

J-2

3-5 that "the *San Francisco Bay Plan*, adopted by BCDC in January 1969 and amended through 1997..." The *San Francisco Bay Plan* has been amended by the Commission 10 times since 1997 and was last amended on April 18, 2002. Nine of the Bay Plan amendments adopted since 1997 are in full force and effect, and the April 18, 2002 amendment is in effect for the Commission's review of permits, but not yet for federal consistency reviews. The Commission submitted a notice of a routine program change to the Office of Coastal Resource Management for its concurrence and for public comment on June 21, 2002. Within 30 days or by July 20, 2002, these new policies will be in force and effect for federal consistency reviews. Therefore, they are quoted below as they will apply to the Commission's federal consistency review of the USN's proposed disposal of NSTI.

J-2

The maps in Figures 2-3, 2-4 and 2-5 do not clearly show the location of the proposed land uses in relation to the location of the Commission's jurisdiction. From our review of the DEIS, the elements of the project which appear to be located in the Commission's jurisdiction from the three proposed alternatives include: (1) waterfront trails or promenades; and (2) roadways; (3) conference center uses; (3) new ferry terminals; (4) marina expansion; (5) public open space; (6) film production uses; (7) institutional and community uses; (8) theme park uses; and (9) publicly-oriented uses golf course and wildlife habitat; and (10) shoreline stabilization. The Final DEIS should identify those project elements within the Commission's jurisdiction so that we can more accurately assess their potential effects on the Coastal Zone. Although the DEIS correctly states that NSTI is not currently within the Coastal Zone, development of the uses proposed and evaluated in the DEIS will occur within the Commission's jurisdiction and will require permit authorization from the Commission. Therefore, these proposals will affect the Coastal Zone and should be evaluated pursuant to the Commission's approved federal coastal management program.

J-3

Table 2-4 Summary of Significant Environmental Consequences and Mitigation Measures. The Land Use category in this table fails to mention the potential inconsistency of proposed land uses for Yerba Buena Island with the Bay Plan waterfront park priority use designation of the site. The FEIS should evaluate the consistency of the proposed reuse plan with the Bay Plan waterfront park priority use designation and what if any changes to the proposed uses would address this inconsistency. In addition, under the topic of Biological Resources on page 2-28 in this table, the DEIS states that under all alternatives, "significant impacts to mudflat habitat, including eelgrass beds, may occur as a result of increased pedestrian and boater activity around Clipper Cove. Expanding the marina or constructing a yacht harbor, new docks or other structures that would cover the surface of the water could impact eelgrass beds, but would require a permit from the COE." Section 66605(a) of the McAteer-Petris act provides, in part "that further filling of San Francisco Bay....should be authorized only when the public benefits from the fill clearly exceed the public detriment from the loss of the water areas...." The FEIS should discuss the public benefits that would accrue from the proposed fill and evaluate these benefits against the public detriment from the loss of important habitat values such as eel grass beds. This analysis should include a cumulative analysis of the proposed impacts in conjunction with the impacts of the SFOBB East Span replacement project which will impact portions of existing eel grass beds in the Bay on the north shore of Yerba Buena Island. The section on Biological Impacts in this table does not indicate that potential increased impacts on harbor seals from the proposed increase in boating activity would be significant. This may not be an accurate assessment of the impacts to harbor seals. The FEIS should include a more extensive evaluation of the types of impacts that could occur. Increased boating activity would increase the interactions between humans and harbor seals and if an increase is expected, disturbance of harbor seals would occur as a result. The DEIS should provide a more thorough analysis supporting the determination that these impacts would not be significant, including a discussion of the threshold of significance, and a cumulative impact analysis that considers the impacts of the SFOBB East Span Replacement project and the Richmond San Rafael Bridge seismic retrofit project which also have impacts on Harbor Seals.

J-4

J-5

J-6

J-7

San Francisco Bay Plan Recreation Policies. Following staff's review of the DEIS, and the proposed reuse alternatives, it appears that certain uses proposed in the alternatives for Yerba Buena Island, including residential and some commercial uses are inconsistent with the Commission's

J-8

waterfront park priority use designation and the Bay Plan recreation policies. The Bay Plan policies on recreation identify, among other things, the need to focus shoreline park planning on docking and picnic facilities for boaters, the opportunity to view nature and open space without adversely affecting habitat and access to the Bay through waterfront trails, recreational boating facilities views and fishing facilities. The Bay Plan policies on recreation also state, in part, that "...[l]imited commercial recreation facilities, such as small restaurants, should be permitted within waterfront parks, provided they are clearly incidental to the park use, are in keeping with the basic character of the park, and do not obstruct public access to and enjoyment of the Bay. Limited commercial development may be appropriate (at the option of the park agency responsible) in all parks shown on the Bay Plan maps except where there is a specific note to the contrary." (Recreation Policy 5(a)). The policies also state, in part, that "recreational facilities that do not need a waterfront location, e.g., golf courses, and playing fields should generally be placed inland, but may be permitted in shoreline areas if they are part of park complex that is primarily devoted to water-oriented uses." The Bay Plan designates the entirety of YBI for waterfront park, beach priority use. Bay Plan Map 4, note 19 requires that areas of YBI "released from military use should be developed for recreation uses." The Reuse Plan makes specific provision for recreation uses on YBI by setting aside 30 acres of inaccessible hillside areas for viewing as open space; by preserving the existing picnic area at the western end of Clipper Cove; and by designating Building 262 for commercial recreation use. Thus, commercial uses and active recreation uses that are appropriate to the park at NSTI could be consistent with the Bay Plan.

J-8

As outlined in the DEIS, the proposed reuse plan at NSTI considers three alternative land use scenarios, including Alternative 1: full build-out of the communities draft reuse plan, at an accelerated rate (completion in 2015 v. 2030), Alternative 2: the Community Reuse Plan modified by the recommendations made by the Urban Land Institute; and Alternative 3: a lower level of development than that envisioned in the Draft Reuse Plan, in addition to the no action alternative. Figure 2-1 and Table 2-2 on pages 2-10 and 2-12 of the DEIS describe the general acreage of proposed land uses under the three alternatives and summarize the specific uses that might occur under the broad headings of public oriented, Institutional and community, residential, and open space/recreation. The range of uses that could occur under these headings is quite broad. The DEIS also states that recreation uses could include both active and passive recreation uses. From reviewing the maps in the DEIS and the description of the proposed reuse alternatives, it is not possible to tell to what degree land uses that may be inconsistent with the Commission's priority use designation would be located within the waterfront park priority use area.

J-9

On page 4-2 through 4-9 of Section 4.1. Land Use, the DEIS fails to mention the San Francisco Bay Plan (BayPlan) designation of Yerba Buena Island for waterfront park priority use. The DEIS states that "Implementing Alternative 1 would increase public access to existing open space areas, including the San Francisco Bay shoreline, and would allow development of recreational facilities, which would be consistent with the San Francisco Bay Plan." The DEIS provides no basis for this conclusion, based on the Commission's Bay Plan waterfront park priority use designation and the recreation policies. The FEIS should evaluate the consistency of the proposed land uses with this priority use designation.

In general, the proposed reuse alternatives raise the following two issues: whether the proposed mix of recreation and non-recreation uses within the Commission's Bay Plan priority use area is consistent with the Bay Plan priority use designation, and whether the alternatives that contemplate non-park uses at NSTI on Yerba Buena Island would be consistent with the Commission's federally approved coastal management plan and whether any of these alternatives would negatively affect the coastal zone. As noted above, the recreation policies state that commercial development should be provided at a shoreside park, only if appropriate for the site and not expressly prohibited in the Bay Plan. Since it is not possible to tell the amount or type of commercial use contemplated in the Waterfront Park Beach priority use area, we are unable to assess the consistency of such use with the Bay Plan policies. Therefore, the blanket statement of consistency with the Bay Plan policies on page 4-3 of the DEIS is premature, and inconsistent with the prior statement that a Bay Plan amendment would be required in order to approve the uses proposed.

J-10

Moreover, it is unclear from the maps and descriptions provided whether residential uses within the priority use area, as proposed would have a negative effect on the coastal zone. It is clear from reviewing the DEIS, alternative 2 most closely conforms to the Bay Plan park priority use designation and recreation policies. The other two alternatives may raise significant issues with regard to the Bay Plan, depending on how these uses are located, and what their affect might be on the public's ability to use the shoreline open space areas. We will need additional information regarding the location and intensity of the proposed non-park uses of the site in order to accurately assess the consistency of the proposed alternatives with the recreation policies in the San Francisco Bay Plan. The Final DEIS should assess whether any proposed active recreational uses within the shoreline areas would be consistent with the Bay Plan recreation policies.

J-10

The majority of the shoreline band on Treasure Island is proposed for passive recreation uses. In general, the reuse plan envisions the shoreline edge being developed with the shoreline protection system (riprap or sheet pile or some combination), a shoreline trail in a landscaped corridor inboard of the shoreline protection system, and a perimeter roadway. Buildings are to be set back at least 100 feet from the shoreline. Since the Reuse Plan establishes policy calling for continuous public access to the shoreline, it can be considered generally consistent with the existing Bay Plan recreation policies and Bay Plan Map 4 policy 18. However, recent amendments to the San Francisco Bay Plan policies on Map 4 regarding Treasure Island addressing the harbor seal haul out site there may affect the nature of public access that can be allowed there.

J-11

Visual Resources. The discussion of impacts on views in Section 4.2 Visual Resources evaluates visual impacts for each of the three alternatives. This section includes an evaluation of the on-site views and visual access for each alternative. In the analysis of the alternatives, the DEIS mentions that beneficial effects would occur because increased public access would provide more opportunities to views. The analysis seems to focus on development on Treasure Island with little or no analysis of the visual impacts or benefits that would occur on Yerba Buena Island. The FEIS should include a discussion of whether the alternatives would modify or remove any existing buildings on Yerba Buena Island to improve views, particularly if the proposed hotel building would block existing view corridors. The FEIS should also discuss in more detail what the opportunities for improving public views are on Yerba Buena Island and how each of the alternatives takes advantage of these opportunities.

J-12

Transportation. On page 3-53, the DEIS, in section 3.5.4 Pedestrian and Bicycle Circulation, describes existing conditions on the island, but does not mention the addition of pedestrian and bicycle access to the east and west spans of the San Francisco-Oakland Bay Bridge. The State of California Department of Transportation is constructing a new east span that will include pedestrian and bicycle access to Yerba Buena Island. The Bay Area Toll Authority has prepared an analysis of the design and cost of providing pedestrian and bicycle access to the west span of the SFOBB as required in State legislation. The DEIS should evaluate the proposed project's effects on these two pedestrian and bicycle facilities. The discussion in Section 4.5 Transportation makes no mention of the pedestrian and bicycle access from the new east span of the SFOBB.

J-13

Biological Resources. On pages 3-59 through 3-65, the DEIS discusses existing biological resources on the site. The DEIS does not mention Pacific Herring (*Clupea pallasii*) as a fish species occurring at the site. However, Section 4.8 discusses potential impacts to the herring fishery, and identifies the impacts as not significant. The Commission's Bay Plan fish, other aquatic organisms and wildlife policies state in part that "to assure the benefits of fish, other aquatic organisms and wildlife for future generations, the greatest extent feasible, the Bay's tidal marshes, tidal flats and subtidal habitat, should be conserved, restored and increased." The Bay Plan policies on Subtidal Habitat state, in part that, "Any proposed filling or dredging project in a subtidal areas should be thoroughly evaluated to determine the local and Bay-wide effects of the project on: (a) the possible introduction or spread of invasive species; (b) tidal hydrology; (c) fish, other aquatic organisms and wildlife; (d) aquatic plants; and (e) the Bay's bathymetry. Projects in subtidal areas should be designed to minimize and, if feasible, avoid any harmful effects....Subtidal areas that are scarce in the

J-14

Ms. Timarie Seneca
Ann Marie Conroy
June 26, 2002
Page 5

LETTER J

Bay or have an abundance and diversity of fish, other aquatic organisms, and wildlife (e.g., eelgrass beds, sandy deep water or underwater pinnacles) should be conserved. Filling, changes in use and dredging projects in these areas should therefore be allowed only if: (a) there is no feasible alternative; and (b) the project provides substantial public benefits. The FEIS should include a supplemental analysis of the impacts to the herring fishery, that considers these Bay Plan policies. It is likely that the Commission would deem any impacts to the eelgrass beds or the herring fishery at NSTI as significant.

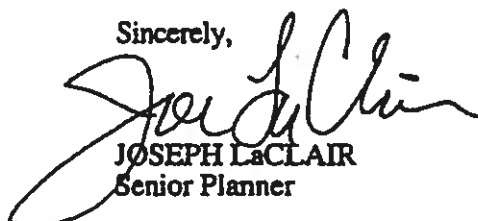
J-14

On page 4-78, the DEIS states that "under alternative 1, the number of boat slips in the proposed marina would quadruple" and on page 4-79, the DEIS states that "the level of disturbing boat activity is not expected to differ substantially from present conditions." This assessment is inaccurate, both because of the certain increase in boater activity in the area as a result of expanding the marina, and a failure to assess impacts from other craft, particularly kayaks that are ever more frequently plying the waters of San Francisco Bay, especially in the vicinity of Yerba Buena Island. As improvements are made to recreation facilities on NSTI during its reuse, the frequency of small craft use in the area will also likely increase. Citizen efforts are underway to create a "water trail" around San Francisco Bay for kayaks and canoes. This trail would include landing and launching sites on Yerba Buena and Treasure Islands. The FEIS should reevaluate the likely impacts to harbor seals that would occur from the reuse of NSTI, including an analysis of small craft impacts. It is likely that active management and an information program will be necessary to address this potentially significant impact.

J-15

Thank you, for the opportunity to comment on the DEIS for the transfer and reuse of Naval Station Treasure Island. If you have any questions regarding these comments or any other matter, please contact me by phone at (415) 352-3656 or email joel@bcdca.gov

Sincerely,



JOSEPH LaCLAIR
Senior Planner

cc: Katie Shulte Joung, California State Clearinghouse
Ann Marie Conroy, Treasure Island Development Authority

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1 **Response to Comments**

2 **Response to Comment J-1.** The referenced text in section 3.1 of the Final EIS has been revised
3 to read:

4 The Bay Area Seaport Plan and the San Francisco Bay Plan, discussed below, are
5 the approved local coastal plans in the portion of San Francisco Bay around NSTI
6 and, in conjunction with other BCDC laws, Special Area Plans, and other
7 guidance, form BCDCs management program for complying with CZMA.

8 **Response to Comment J-2.** The referenced text in section 3.1 of the Final EIS has been revised
9 to read:

10 The San Francisco Bay Plan, adopted by BCDC in January 1969 and amended
11 through 2002, includes policies...

12 It is noted that 2002 Bay Plan amendments may be in effect at the time of NSTI disposal.

13 **Response to Comment J-3.** As stated in section 3.1.1, Regulatory Considerations, federal
14 property such as NSTI is not subject to the CZMA and, therefore, is not subject to the priority
15 use designations and policies of the Bay Plan. The expectation is that BCDC would amend the
16 Bay Plan to incorporate priority use designations for Treasure Island and Yerba Buena Island,
17 following transfer of the property out of federal ownership. At that time, all specific reuse
18 development would be subject to these designations through BCDC permitting authority.

19 The alternatives analyzed in the EIS are based on conceptual plans that delineate the general
20 arrangement of land uses but do not depict the specific locations of development within these
21 areas. It is not possible in the EIS to meaningfully assess the consistency of specific
22 development activities with BCDC policies based on these general development plans, as the
23 commentor has noted. Although priority use designations are not in effect for NSTI, detailed
24 reuse plans are not available, and some specific uses under the alternatives may be inconsistent
25 with the proposed priority use designations, it appears that most of the reuse concept would be
26 substantially consistent with future Bay Plan policies for NSTI. The text in section 4.1
27 addressing potential impacts to land use policy under each reuse alternative has been revised to
28 reflect this.

29 **Response to Comment J-4.** Please see response to comment J-3 above regarding consistency
30 with BCDC policies.

31 **Response to Comment J-5.** Eelgrass is not found in the area of marina construction and would
32 not be affected. The text in Table 2-4 of the Final EIS has been corrected to read:

33 Expanding the marina or constructing a yacht harbor, new docks, or other
34 structures that would cover the surface of the water would impact Waters of the
35 United States ~~could impact eelgrass areas~~ but would require a permit from the
36 BCDC and the COE.

1 The appropriate text regarding this impact in section 4.8 (Biological Resources) of the
2 Final EIS, has also been revised.

3 **Response to Comment J-6.** Please see response to comment J-5 above regarding impacts to
4 eelgrass beds. Potential cumulative impacts to eelgrass beds from reuse alternatives and the
5 SFOBB east span replacement project are discussed in Chapter 5.

6 **Response to Comment J-7.** The determination that potential impacts to harbor seals would be
7 less than significant is based on the fact that the harbor seal haul-out site on Yerba Buena Island
8 is on US Coast Guard property and is not part of the reuse plan area, and that no modifications
9 or public access are considered in this area as part of the disposal and reuse of NSTI.
10 Furthermore, the haul-out site is in a remote location with very steep topography that is a
11 natural obstacle to access by land.

12 The population of approximately 700 harbor seals in the San Francisco Bay and at Yerba Buena
13 Island is robust. The number of seals has remained fairly constant since the early 1970s, even in
14 the midst of increasing development. The local sub-population of harbor seals at Yerba Buena
15 Island has also remained steady, with several hundred harbor seals using Yerba Buena Island as
16 a haul-out site year-round.

17 While an increase in boat traffic in the area could be expected under each of the reuse
18 alternatives, the haul-out site is far removed from the area where boat traffic would increase.
19 Additional boat traffic that could occur near the haul-out site would be limited by the fact that
20 the site is in a small rocky cove that is difficult to access by boat. Access is further limited by
21 NMFS signage clearly stating that the seals are protected under the MMPA and that the public
22 must stay away. While the routes of proposed ferries are not known, it is unlikely that they
23 would be close enough to the shoreline to affect the haul-out site.

24 Based on the above factors, the Navy has determined that potential impacts to the harbor seals
25 from the disposal and reuse of NSTI do not meet the criteria for significance stated in the EIS
26 and would not adversely affect any species afforded protection under the MMPA. As part of
27 the disposal action, the Navy has consulted with NMFS about potential impacts from disposing
28 of the property. NMFS has closed consultation and has issued its concurrence with the Navy's
29 assessment of impacts.

30 **Response to Comment J-8.** Please see response to comment J-3 above regarding consistency
31 with BCDC policies.

32 **Response to Comment J-9.** Please see response to comment J-3 above regarding consistency of
33 with BCDC policies.

34 **Response to Comment J-10.** Please see response to comment J-3 above regarding consistency of
35 with BCDC policies.

36 **Response to Comment J-11.** Please see response to comment J-3 regarding consistency of with
37 BCDC policies. The seal haulout area is not within NSTI and therefore no development or

1 public access would occur in the area. Please see response to comment J-7 above regarding
2 potential impacts to harbor seals.

3 **Response to Comment J-12.** Specific development plans for Yerba Buena Island, such as the
4 removal, addition, or modification of buildings, including the conference center, have not been
5 finalized. Analysis of potential visual impacts should be conducted by the designated property
6 recipient or private developer as part of the environmental review for specific development
7 plans implemented under reuse. Nevertheless, the perimeter areas on Yerba Buena Island are
8 expected to remain open space, based on the steep topography of these areas and the land use
9 concept illustrated in the Draft Reuse Plan (San Francisco 1996e). This also is stated in section
10 4.2, Visual Resources: "It is assumed that existing view corridors to the Bay would be kept open,
11 with additional open space perimeter opportunities and public access opportunities provided
12 along the waterfront open space."

13 **Response to Comment J-13.** Please see response to comment H-20 regarding bicycle and
14 pedestrian access to Yerba Buena Island from the new SFOBB.

15 **Response to Comment J-14.** Please see response to comment J-3 regarding consistency of with
16 BCDC policies.

17 The potential for impacts to the Pacific herring were evaluated in the Draft EIS and it was
18 determined that potential impacts to this species would not be significant. Pacific herring was
19 discussed on page 3-79 of the Draft EIS. Potential impacts to this species were discussed with
20 regard to dredging impacts mudflat and eelgrass habitat (page 4-77 of the Draft EIS). No other
21 in-water construction was proposed that could potentially impact the species. Pacific herring is
22 not discussed under sensitive resources because it has no listing status and therefore no federal
23 protection.

24 **Response to Comment J-15.** Please see response to comment J-7 above regarding potential
25 impacts to harbor seals.

26

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California Regional Water Quality Control Board

San Francisco Bay Region



Justin H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

Date: JUN 20 2002
File No. 2169.6013 (SLR)

Ms. Timarie Seneca
BRAC Operations Office,
Southwest Division Naval Facilities Engineering Command, Code 06CM.TS
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8517

Subject: Comments on Draft Environmental Impact Statement, Naval Station Treasure Island, San Francisco

Dear Ms. Seneca:

Regional Water Quality Control Board (RWQCB) staff reviewed the draft report titled *Disposal and Reuse of Naval Station Treasure Island, Draft Environmental Impact Statement (EIS), San Francisco, California*, received on May 10, 2002, and prepared by Southwest Division, Naval Facilities Engineering Command. The EIS was prepared to comply with the National Environmental Policy Act (NEPA). The EIS evaluates three reuse alternatives proposed in the Draft Reuse Plan, dated July 1996, prepared by the Office of Military Base Conversion, Planning Department, City and County of San Francisco and the San Francisco Redevelopment Agency. The EIS also evaluates the No Action Alternative in which the Navy would retain ownership in a caretaker status. The companion Environmental Impact Report (EIR) will be prepared by the City and County of San Francisco and is due later this summer.

The EIS analyzes potential environmental impacts relating to land use; visual resources; socio-economics; cultural resources; transportation; air quality; noise; biological resources; geology and soils; water resources; utilities; public services; and hazardous materials and wastes. The following comments have been prepared for this document.

Section 3.10.1 Regulatory Considerations – (p. 3-119) Please state the beneficial uses of groundwater at Treasure Island and Yerba Buena Island.] K-1

Section 3.10.3 Ground Water – (p. 3-122) In addition to the recommendations presented in the pilot beneficial use study (RWQCB, 1996), the RWQCB submitted a letter to the Navy stating that the quality and the hydrogeologic conditions of the groundwater beneath Treasure Island is such that the water is not a potential source of drinking water pursuant to SWRCB Resolution 88-63 and Regional Water Quality Control Board (RWQCB) Resolution No. 89-39. Please add this to the report.] K-2

Section 3.13.3 Petroleum Hydrocarbons – (pp. 135-136) Please update the recommendations for the site remediation to reflect the most recent decisions made at each site, as stated in the draft Corrective Action Plan (CAP)(2002).] K-3

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at <http://www.swrcb.ca.gov>.

Ms. Seneca

- 2 -

Section 3.13.3 Site 08 – (p. 138) Please clarify what additional research is planned to evaluate ecological risk from potential surface water runoff at Site 8.

] K-4

Section 3.13.3 Site 09 – (p. 138) Please update the site summary for Site 09 to state that although no volatile organic compounds (VOCs) were detected in 09-MW01, additional investigation is being conducted to evaluate the extent of contaminants in the hoist area.

] K-5

Section 3.13.3 Site 10 - (p. 139) Please update the schedule for the additional investigation at Site 10.

] K-6

Section 3.13.3 Site 21 - (p. 141) The document states " recent data reviewed by the RWQCB suggests that discharges are occurring to the Bay". What is the source of this statement? Current data indicate that VOCs are not migrating to the Bay.

] K-7

Section 3.13.3 Site 27 – (p. 142) What is the status of the RWQCB Order and the Compliance Plan at the Clipper Cove site?

] K-8

Section 4.10.2 Alternative 2 (Water Resources) – (p. 4-100) As stated in the text "Under Alternative 2, a golf course would be developed on the northern portion of Treasure Island". Please describe the additional impacts associated with the proposed golf course and the mitigation measures that will be required. For example, a chemical application and management plan (CHAMP) will be required to control chemical applications and discharge to surface water

] K-9

Section 4.11 Utilities – (p. 4-103) Please include a discussion that all appropriate efforts will be made to maximize use of reclaimed water for landscape irrigation including golf course irrigation, under each of the proposed alternatives.

] K-10

If you have questions, please feel free to contact me by telephone at (510) 622-2377 or by electronic mail at slr@rb2.swrcb.ca.gov.

Sincerely,



Sarah L. Raker, R.G., C.H.G.
Associate Engineering Geologist

EIS comments.doc

cc: Mr. David Rist, Department of Toxic Substances Control
Mr. Phillip Ramsey, U.S. Environmental Protection Agency
Ms. Martha Walters, San Francisco Redevelopment Agency

1 **Response to Comments**

2 **Response to Comment K-1.** The following text has been added to section 3.10.1 of the Final
3 **EIS:**

4 The San Francisco Bay RWQCB has determined that groundwater beneath
5 Treasure Island is not a potential source of drinking water and is therefore not
6 considered to be a beneficial use. Groundwater is not used for any beneficial use
7 at NSTI.

8 **Response to Comment K-2.** The following text has been added to section 3.10.3 of the Final
9 **EIS:**

10 The San Francisco Bay RWQCB determined that ground water beneath Treasure
11 Island is not a potential source of drinking water, pursuant to SWRCB Resolution
12 no. 88-63 and RWQCB Resolution No. 89-39, because of the quality and
13 hydrologic conditions of the ground water.

14 **Response to Comment K-3.** The summaries of IR and CAP sites in section 3.13 Hazardous
15 Materials and Waste have been updated to reflect current status. Please note that restoration
16 pursuant to CERCLA is subject to frequent change. Information on any status updates for sites
17 can be obtained from the BRAC Operations Office, as listed in section 3.13.3 of the EIS.

18 **Response to Comment K-4.** An RI is currently underway at IR Site 08. A determination as to
19 any additional investigations and possible remedial actions will be made following completion
20 of the RI. Information on any future investigations can be obtained from the BRAC Operations
21 Office, as listed in section 3.13.3 of the EIS.

22 **Response to Comment K-5.** An RI is currently underway at IR Site 09. A determination as to
23 any additional investigations and possible remedial actions will be made following completion
24 of the RI. Information on any future investigations can be obtained from the BRAC Operations
25 Office, as listed in section 3.13.3 of the EIS.

26 The following text has been added to the discussion of IR Site 09 in section 3.13 of the Final EIS:

27 Navy completed additional investigation in January 2003 and is currently
28 preparing an RI report in anticipation of a No Action ROD. Site closure is
29 anticipated in late 2004.

30 **Response to Comment K-6.** The discussion of IR Site 10 in section 3.13 of the Final EIS has been
31 revised to read:

32 Navy completed additional investigation in January 2003 and is currently
33 preparing an RI report in anticipation of a No Action ROD. Site closure is
34 anticipated in late 2004.

1 Response to Comment K-7. Several rounds of groundwater sampling have been conducted at
2 IR Site 21 and no VOC discharge has been documented. The text regarding migration of VOCs
3 to the Bay has been deleted.

4 Response to Comment K-8. The RWQCB Order and the Compliance Plan were issued for
5 investigation of the skeet range in Clipper Cove prior to commencement of remedial activities
6 on NSTI pursuant to CERCLA. With the concurrence of RWQCB, investigation of this site was
7 incorporated into the CERCLA process. The FFSRA has superceded the RWQCB Order and
8 Compliance Plan; the schedule for action at the former Clipper Cove skeet range (IR Site 27) is
9 now part of FFSRA.

10 Response to Comment K-9. Potential significant impacts from hazardous materials use at the
11 golf course under Alternative 2 are addressed in section 4.13 Hazardous Materials and Waste,
12 of the EIS. The text in this section has been revised to read:

13 For example, golf course design and operation could include BMPs for the
14 storage, handling, and use of pesticides or fertilizers, including a chemical
15 application and management plan.

16 The following text has been added to section 4.10 (Water Resources) under the discussion of not
17 significant impacts for Alternative 2:

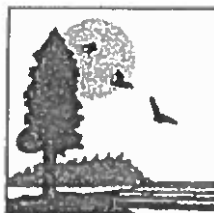
18 *Water Quality* (Factors 1 and 2). Not significant impacts to water quality would
19 be similar to those described for Alternative 1 with the exception that Alternative
20 2 would have a slightly greater potential impact to water quality as a result of the
21 development of a golf course. Chemicals associated with the golf course could
22 adversely affect water quality if not adequately managed. Hazardous materials
23 management would be subject to all regulatory controls. In addition, a chemical
24 application and management plan would be required to address the
25 management of these materials.

26 Response to Comment K-10. The Navy will have no authority or responsibility over actual
27 reuse activities and, consequently, the Navy is not in a position to impose specific mitigation
28 measures such as use of reclaimed water. The designated property recipient may encourage or
29 require use of reclaimed water for reuse activities. Although the draft development plan for
30 NSTI submitted to the City and County of San Francisco in July 2002 is not final, the plan does
31 call for use of reclaimed water for irrigation.

STATE OF CALIFORNIA

GRAY DAVIS, Governor

CALIFORNIA STATE LANDS COMMISSION
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Sacramento, CA 95825-8202



PAUL D. THAYER, *Executive Officer*
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Contact FAX: 916-574-1955

June 24, 2002

File Ref: SCH 2002052061

US Navy, Southwest Division
Naval Facilities Engineering command
1230 Columbia Street, Suite 1100
BRAC Operations Office
San Diego, CA 92101-8517
ATTN: Ms. Timarie Seneca

Dear Ms. Seneca:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Disposal and reuse of Naval Station Treasure Island, San Francisco, California.

Under the Land Use section (3.1), Page 3-7, the EIS states that the State Lands Commission has allowed existing specialized or single-purposes facilities to continue as nonconforming public trust uses for their useful life. This reuse issue should be further clarified by adding the language in Section 9(a), (b), (c) of Chapter 898, Statutes of 1997.

- **Section 9, Subdivision (a)** "...existing buildings or structures on the Trust Property which are incapable of being devoted to trust purposes may be used for other purposes, consistent with the reuse plan for the Trust Property, for the remaining useful life of such buildings or structures."
- **Section 9, Subdivision (b)** "The Authority and the State Lands Commission shall, by agreement, establish the remaining useful life of the buildings and structures described in subdivision (a), either individually or by category, provided that in no case shall the useful life of any building or structure be deemed to extend less than 25 years or more than 40 years from the effective date of this act."
- **Section 9, Subdivision (c)** "The maintenance and repair of any of the existing buildings or structures described in subdivision (a), and any structural or other alterations necessary to bring such buildings or structures into compliance with applicable federal, state, and local health and safety standards, including, but not limited to, seismic upgrading, shall be permitted, provided such activities will not enlarge the footprint or the size of the shell of such buildings or structures."

L-1

LETTER L

If you have any questions, please do not hesitate to contact me at the number referenced above.

Sincerely,

Grace Kato

Grace Kato
Public Land Management Specialist

cc: Betty Silva

1 **Response to Comments**

2 **Response to Comment L-1.** It is the Navy's position that the United States acquired full fee
3 simple absolute title to all the property at NSTI, including the tidelands and submerged lands,
4 and that the property would not be subject to the public trust upon disposal by the Navy.
5 However, the State of California believes that all former and existing tidal and submerged lands
6 on Treasure Island would be subject to the public trust in the event of a transfer of the property
7 from the Navy. In 1997, the Treasure Island Conversion Act (TICA) (1997 Cal. Stat. 898, AB 699)
8 authorized the City and County of San Francisco to establish TIDA as the redevelopment
9 agency responsible for redeveloping NSTI. The act also granted TIDA power to administer and
10 control property at NSTI, which the State of California identified as land that will be subject to
11 the public trust upon its release from federal ownership. Thus, the City and County of San
12 Francisco's reuse planning process assumes the public trust applies, despite the Navy's
13 contention that it does not. The text in section 3.1.1 has been revised to more accurately
14 characterize the Navy's position on the public trust at NSTI.

15

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June 17, 2002

US Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
BRAC Operations Office
San Diego, CA 92101-8517
Attn: Ms. Timarie Seneca

Subject: DEIS for the Disposal and Reuse of Naval Station Treasure Island

Dear Ms. Seneca,

I am writing provide comments for the San Francisco Bay Trail Project on the U. S. Navy's Draft Environmental Impact Statement (DEIS) for the Disposal and Reuse of Naval Station Treasure Island. Below, you will find a general overview of the Bay Trail and its interest in the project, as well as specific comments pertaining to the DEIS.

Bay Trail Overview & Interest in Project

The Bay Trail Project is a nonprofit organization administered by the Association of Bay Area Governments (ABAG) that coordinates the implementation of the Bay Trail. When complete, the Bay Trail will be a continuous 400-mile recreational pathway that will encircle San Francisco and San Pablo bays in their entirety. It will link the shoreline of all nine Bay Area counties, as well as 47 cities. A little more than half the length of the proposed system has been developed to date. Enclosed, you will find an overview map of the Bay Trail, a detailed map of the Bay Trail in the vicinity of Treasure Island, and a Bay Trail fact sheet.

The Bay Trail provides fantastic opportunities for recreation, environmental education, wildlife viewing and alternative transportation throughout the Bay Area. It also serves as a connective pathway between cities and counties as well as between parks and other open spaces. The Bay Trail currently travels across the Golden Gate Bridge and the Dumbarton Bridge, and will soon be implemented on the east span of the Bay Bridge, the Carquinez Bridge and the Benicia-Martinez Bridge. These connections provide trail users with the opportunity for non-motorized travel throughout the region, providing first-hand experience of the Bay and its amazing resources.

As you may know, an 15.5-foot-wide bicycle and pedestrian pathway is planned to run along the south side of the eastbound deck of the new 2-mile long east span of the Bay

Administered by the Association of Bay Area Governments
P.O. Box 2050 • Oakland California 94604-2050
Joseph P. Bort MetersCenter • 181 Eighth Street • Oakland California 94607-4756
Phone: 510-464-7836
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Bridge. The addition of the Bay Trail to this new span of the Bay Bridge creates momentum for providing a continuous link between East Bay trails (including the planned Eastshore State Park) and Treasure Island.

In addition, the reuse of Treasure Island provides an excellent opportunity to extend the Bay Trail along the shoreline of Treasure and Yerba Buena Islands. A continuous pathway around Treasure Island's perimeter would no doubt make it a destination point for recreation and entertainment, and increase the accessibility of the Island.

We would appreciate the opportunity to work with the Navy and the Treasure Island Development Authority on the planning and design of a new Bay Trail spur connecting the planned Bay Trail on the new east span of the Bay Bridge to and around Treasure Island.

Comments Pertaining to the DEIS

Chapter 2, Proposed Action Alternatives

While each of the alternative maps (Figure 2-3 to Figure 2-5) depict a band of shoreline open space around Treasure Island, a bicycle and pedestrian pathway is discussed only in Alternative 1 (page 2-17). The DEIS should clarify whether Alternative 2 and Alternative 3 would also provide for a shoreline pathway around Treasure Island.

M-1

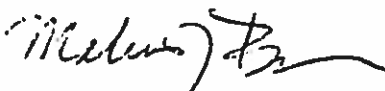
General Comment

We are aware of the fact that the City and County of San Francisco and Caltrans are involved in a continuing discussion regarding the design of the Bay Bridge touchdown on Yerba Buena Island (Figure 5-2, page 5-6). It is unclear, however, how the connection between the bicycle and pedestrian pathway on the east span will be planned for and implemented. The DEIS should identify a process for planning a continuous connection between the planned pathway on the new Bay Bridge east span and Yerba Buena and Treasure Islands, including all potential stakeholders and their role in the planning process.

M-2

We are grateful for the opportunity to comment of the DEIS and look forward to the completion of the final Disposal and Reuse plan for Treasure Island. Please feel free to call me at 510/464-7919 with any additional questions or comment.

Sincerely,

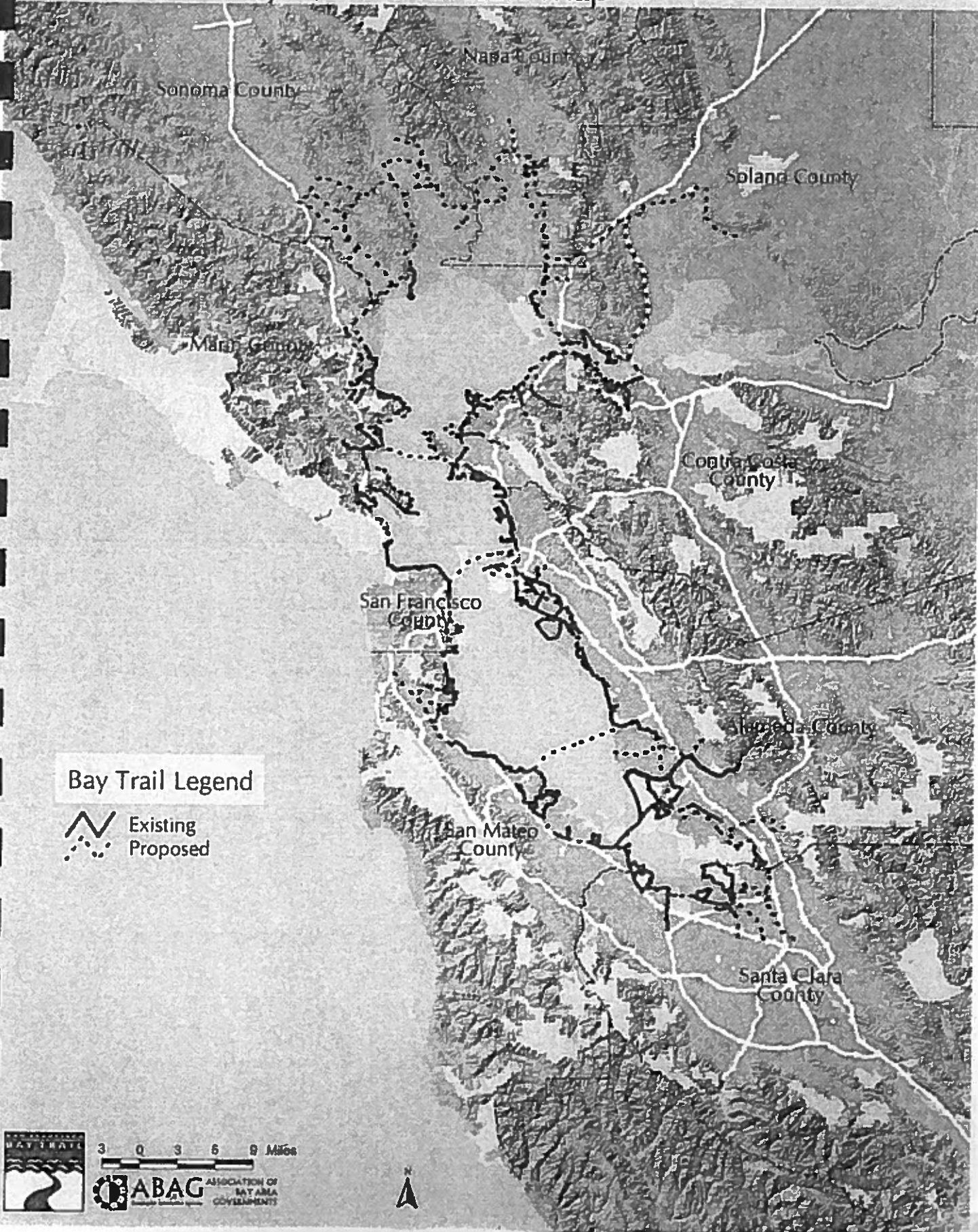


Melissa Barry
Bay Trail Planner

Enclosures: San Francisco Bay Trail: Overview Map
San Francisco Bay Trail: Treasure Island Connections
Bay Trail Fact Sheet

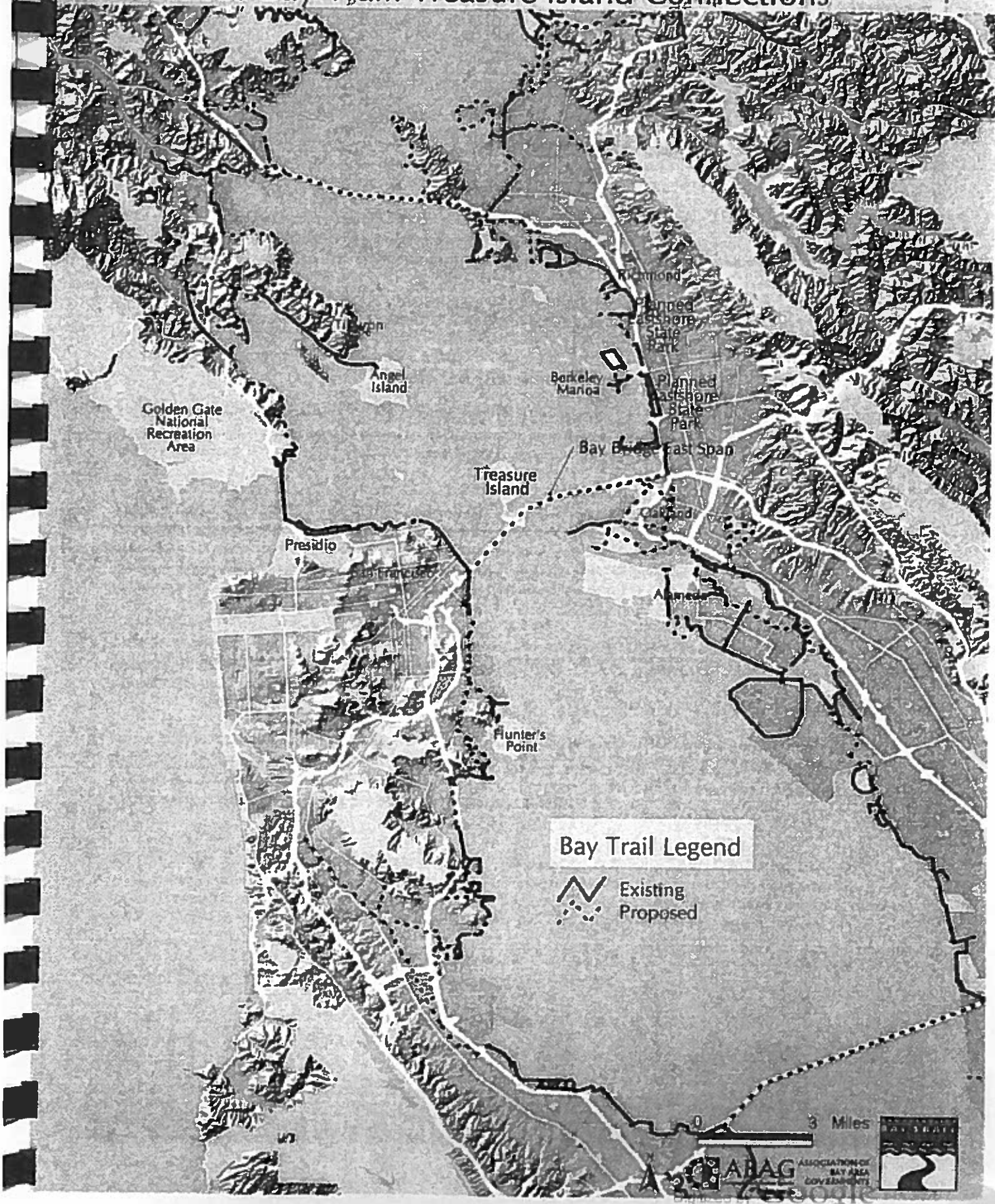
San Francisco Bay Trail: Overview Map

LETTER M



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San Francisco Bay Trail: Treasure Island Connections



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A FEW FACTS ABOUT THE SAN FRANCISCO BAY TRAIL

- When complete, the Bay Trail will be a **CONTINUOUS 400-MILE CORRIDOR** that will encircle San Francisco and San Pablo bays, connecting people to each other and to the water. It will link the shorelines of all nine Bay Area counties and pass through 47 cities. To date, slightly over half the Bay Trail's ultimate length has been developed.
- The Bay Trail provides free and easily accessible **RECREATIONAL OPPORTUNITIES** for outdoor enthusiasts, including hikers, joggers, bicyclists and skaters. It also offers a setting for wildlife viewing and environmental education, and it increases public respect and appreciation for the Bay.
- The Bay Trail also has important **TRANSPORTATION BENEFITS**; it provides a commute alternative for cyclists, and connects to numerous public transportation facilities, including ferry terminals, light-rail lines, bus stops, and Caltrain, Amtrak, and BART stations. Also, the Bay Trail will eventually cross the major bridges in the region.
- The Bay Trail **PROVIDES ACCESS** to commercial, industrial and residential neighborhoods; points of historic, natural and cultural interest; recreational areas like beaches, marinas and fishing piers; and over 130 parks totaling 57,000 acres of open space. It passes through highly urbanized areas such as downtown San Francisco as well as remote natural areas such as the San Francisco Bay National Wildlife Refuge. Depending on the location of its segments, the Bay Trail consists of paved multi-use paths, dirt trails, bike lanes, sidewalks or signed bike routes.
- As much as possible, the Bay Trail overlaps with, and connects to, other trails and local bike routes. The Bay Trail should not be confused with the Bay Area Ridge Trail, a separate **REGIONAL TRAIL NETWORK** that travels inland, mostly along the Bay Area's mountain ridges.
- Senate Bill 100, authored by then-state Senator Bill Lockyer and passed into law in 1987 with the endorsement of the entire Bay Area legislative delegation, introduced the concept of a **"RING AROUND THE BAY"**. SB 100 directed the Association of Bay Area Governments (ABAG) to develop an alignment for the Bay Trail as well as funding and implementation plans. This plan for the Bay Trail was adopted by ABAG in 1989.
- Implementation of the Bay Trail is coordinated by the Bay Trail Project, a **NONPROFIT ORGANIZATION** created by ABAG and housed at its offices in Oakland. To carry out its mission, the Bay Trail Project raises funds for trail construction and maintenance, ensures consistency with the adopted Bay Trail Plan, provides technical assistance, enlists public participation in trail-related activities, and publicizes the Bay Trail and its benefits to the region.

To learn more about the Bay Trail, visit the Bay Trail Project's web site at <http://www.baytrail.org>; call us at 510/464.7935 (Janet), .7909 (Laura), .7919 (Melissa); .7915 (David) or e-mail us at BayTrail@abag.ca.gov. (June 2002)



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1 **Response to Comments**

2 **Response to Comment M-1.** The following text has been added under the heading "Open
3 **Space and Recreation Uses"** for Alternatives 2 and 3 in section 2.4 of the Final EIS:

4 Similar to Alternative 1, the shoreline open space would be widened to
5 approximately 100 feet (30 m) and would feature a bikeway and pedestrian path.

6 **Response to Comment M-2.** Please see response to comment H-20 regarding the connection
7 between the bicycle path on the SFOBB and Yerba Buena Island.

8

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