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April 21, 2016

Brian Aviles, Director  
GGNRA Planning Division  
Building 102, Ft. Mason  
San Francisco, CA 94123

Dear Brian,

Thank you for the opportunity to meet with us about the Crissy Field Repair Centennial Project. It is our understanding that this project is comprised of two subprojects:

First project: the repair of the storm drains at East Beach and the resurfacing of the promenade with shale composite. CFDG supports this portion of the subproject. However, CFDG does not support the expansion of the promenade to 30' and the proposed changes to the East Beach parking lot.

Second project: reconfiguration of the East Beach parking lot. Below is a summary of CFDG's concerns with this subproject during our meeting with you and Kirsten on April 18, 2016.

1. The proposed plan to reconfigure the East Beach parking lot would create a parking lot with 24' of clearance in the aisle, which is not enough space for unloading sail boards, bikes, picnic supplies, or dogs, and would create congestion. The existing configuration allows unloading directly to staging areas near bathrooms and/or beach. The current plan would eliminate that possibility and makes the user experience for visitors with loads more difficult because of the congestion resulting from the proposed design that would force users into a few access points. Generally this plan moves visitors with loads east and south, away from where they want to be, and concentrates them in

ways that will cause conflict. We do not have the measurement for the existing major aisle but it appears to be wider than contemplated.

2. Current and historical uses of the east end of the parking lot adjacent to the bathrooms have generally been for commercial dog walker parking. It is gravel and not attractive for kids, board sailors, etc., and therefore keeps the conflicts down. The new plan would either force the commercial dog walkers out of this space, or require commercial dog walkers to compete with board sailors, paddle boarders, bicyclists and picnickers for staging areas. Under current dog walking management policies, on weekends conflicts will be escalated because dog walkers and other visitors with loads will compete for fewer spaces adjacent to staging areas. If the Dog Management Plan Preferred alternative is adopted without changes, the changes proposed for the east end of the parking lot would create increased user conflict because all dog walkers would need to travel east to middle beach for off-leash dog walking and the new configuration would force them across other users who are off-loading in the parking lot, therefore creating more chance for conflict between groups. Often the bike groups or board groups seem to stage next to their cars for parts, supplies, and security (so nothing is stolen).

3. The current use of the diagonal walkway is by walkers, dog walkers, runners, strollers, etc., coming from Marina Green to the promenade, and this current use rarely conflicts with parking. No data is available but based on our experience and observations we estimate that 80-90% of the time there are no cars parked near the path. Only on very high use times such as weekends and great weather days would there be a potential issue. This plan permanently moves that access in front of the Crissy Field Center.

4. The vegetative barrier planned between the parking lot and the promenade has several problems. First, the goal of hiding the cars is misplaced. It would preclude a common use of these lands; often during the week many visitors drive up the promenade and have lunch or just enjoy the view. That will not be possible if the vegetative barrier is implemented. Moreover, if the vegetative barrier grows at all, having the promenade hidden from the cars and vice versa poses a security risk at night. What comments has the GGNRA received about complaints about seeing the cars?

5. During the many special events held at East Beach when there is event parking, those with dogs in their cars are currently directed to the west and the beach for easy access, and event parkers seem to be sent to the east by people with flags and yellow shirts. With the new plan, that would no longer be possible, increasing potential for conflicts between event parkers and other visitor groups. And we anticipate that the board sailor groups and bike groups will be similarly directed.

6. Removing the staging areas adjacent to their cars and forcing groups to stage in the parking lot among moving cars increases congestion and increased risk of user

conflict. We are concerned for the safety of kids, dogs and other users who are attending to staging, all of whom may be distracted by the increased activity in this area, and may be subject to increased risk of user and vehicular collision in this condensed area.

7. By moving parking to the east and south closer to where the Sports Basement will be located will further increase congestion and demand for these parking spaces. We anticipate that more customers going to Sports Basement will park at East Beach because people will have to pay to park in the Sports Basement parking area. The existing plan spreads out the parking and helps to minimize those conflicts.

8. The proposed 30' promenade at East Beach is not warranted for normal use. The promenade funnels down to 20' for the rest and you will create bottleneck at bridge. We think it is better to have the promenade consistently spread out. Most days there is no need for 30'. In fact, it will probably make crossing the promenade more difficult, with 10 extra feet of cross-traffic to manage. Most conflicts are bike vs. other visitors (involving a speed differential). Making the promenade wider will not slow down bikes and reduce speed differential issues.

9. The impact analysis for visitor use just does not take into account how Crissy Field is currently used and will be used in the future.

10. Perhaps a solution for this subproject would be to repave the existing layout for parking, rather than the proposed reconfiguration.

11. We also mentioned about the importance of at least one design charrette during this environmental review process for the reconfiguration where the public at large can fully participate and weigh about their concerns and make suggestions.

Again, CFDG requests a time extension of the proposed project of at least two weeks so the public has the time to assess and submit their comments on the proposed CE of this project.

To date, we do not believe that the GGNRA has provided sufficient amount of time (only two weeks) for the public to respond to this proposed project, nor adequate amount of public outreach. An occasional roving ranger does not qualify as vigorous public outreach.

In addition, the GGNRA has failed to analyze the potential significant adverse cumulative impacts of the proposal in the context of its interactions with its immediate surrounding area, i.e., the rest of Crissy Field, Mason Street corridor, the long term use of the Crissy Field Center (temporary building), sea level rise impacts, and the overall negative impact on visitor experience of the reconfiguration of the east beach parking lot to the visitors at Crissy Field.

CFDG believes that at bare minimum an Environmental Assessment under NEPA is warranted by the GGNRA to properly assess and evaluate the impacts of the reconfiguration of the east beach parking lot. Moreover, given that the potential impacts and mitigation considerations of the current Crissy Field Repair Centennial Project proposal are identical to those involved in the ongoing Dog Management Plan (DMP) process (e.g., user conflict, access to recreation, design solutions), and this proposal involves one of the keystone recreation areas of the GGNRA being addressed in the DMP, CFDG believes that it is inappropriate to segment consideration and environmental review this proposal from the overall dog management plan processes which are ongoing. Accordingly we request that this proposal be considered as part of the overall DMP process, with potential significant adverse environmental impacts (including direct, indirect, and cumulative impacts, as well as alternatives and mitigation) being analyzed in context of the DMP draft rule and supplemental draft environmental impact statement. Failure to consider this proposal in that context will be a failure of GGNRA to meet its obligations under NEPA.

We would appreciate it if you would communicate with us as soon as possible about granting the public this important two-week extension of the public comment period, as we do not support the proposed CE for this project. CFDG would like a response to this request by COB April 21, 2016.

Thank you for the opportunity to meet with us this past Monday.

Sincerely,

*Martha Walters*

Martha Walters

Chair, CFDG

Cc: Christine Lehnertz, GGNRA Superintendent

Robert Edmonson, Chief of Staff to Democratic Leader Nancy Pelosi