



SAN FRANCISCO BOARDSAILING ASSOCIATION
1592 UNION STREET, BOX 301 • SAN FRANCISCO, CALIFORNIA 94123

April 22, 2016

Ms. Christine Lehnertz
General Superintendent
Golden Gate National Recreation Area
Attn: Crissy Field Promenade and East Beach Parking Repairs
Fort Mason, Bldg 201
San Francisco, CA 94123

Subject: Comments on the recently proposed Crissy Field Centennial Repair Project's preliminary design drawings and draft environmental review documents

Dear Ms. Lehnertz:

Crissy Field East Beach is an internationally renowned, world class boardsailing site for both windsurfing and kiteboarding. The San Francisco Boardsailing Association (SFBA) is a not-for-profit organization founded in 1986 to protect & enhance boardsailing access and to promote safety and related education in the San Francisco Bay Area, and the establishment of Crissy Field as a permanent boardsailing site was our first focus.

SFBA has been a GGNRA park-partner since 1986, the same year that Mr. Brian O'Neill (who became one of the longest tenured superintendents in the National Park Service) took charge. For the next fourteen years SFBA participated fully in every step of planning and design for Crissy East Beach as we know it today. Both during construction and since completion in 2001, SFBA has contributed over \$50,000 for enhancements (including western beach assess, public web cams and dog-wash station) and has provided volunteers for major initiatives whenever needed, including the major beach rubble removal and sand replenishment efforts when the tidal basin inlet/outlet eroded the beach to the point of extreme risk to anyone entering the water.

Over the last fifteen years SFBA has worked closely with both GGNRA and the GGNPC on the details of East Beach maintenance, modifications and additions, such as the addition of the picnic areas at the west end of East Beach and establishment of the Temporary Crissy Field Center FROG buildings which are sited at the east end, currently displacing approximately 100 turf parking spots. More recently, since 2012 SFBA has worked closely with GGNPC staff on details of the "Crissy Refresh" project, which was supposed to have 'repaired' the wear and tear resulting from the America's Cup events in 2013 and has yet to be implemented.

Throughout the thirty years described above and the strong relationships built with leadership and staff at GGNRA and GGNPC, never once has SFBA questioned or needed to question proposed project agendas or NEPA compliance. Thus one can imagine our surprise when your March 2016 Centennial Repair Project proposal hit the streets with 1) no advanced notice and 2) an agenda to essentially turn much of the East Beach area into a pavement parking lot.

Additionally, while one can empathize with the desire to use a gift and grant worth \$5 Million for repair, the proposal as we see it is a complete redesign of the “use” of Crissy Field East Beach by the elimination of much of the western end pervious parking/rigging-friendly surfaces and replacement with pavement. With this in mind it is completely unrealistic to expect that a design process which took years to complete initially can be replicated with only three weeks of project introduction followed by a fourteen day comment period.

The findings in the June 1996 Crissy Field Plan Environmental Assessment state that: “*Staff and designers will also work with representatives of the San Francisco Boardsailing Association on these and other details of the east beach area.*” True to your word, GGNRA and GGNPC representatives met with SFBA representatives in late March and early April 2016 and provided us the opportunity to:

1. Demonstrate why the western end of Crissy East Beach is so important to boardsailors for parking/rigging and launching,
2. Explain why the eastern end holds little value because of the hardened shoreline, and
3. Review, discuss and explain why the initial and current proposals are a net loss of parking/rigging (and thus access) for the boardsailing community.

SFBA appreciates the dialogue and opportunity we’ve had to-date to enhance the proposal by including western end vehicle circulation and reducing the overall ‘take’ of upwind (western end) parking/rigging-friendly surfaces; however, as the proposal stands today this area would still lose over 75 spaces. This is a significant impact which should be addressed in an Environmental Assessment (EA) at a minimum for the following reasons - This is a significant component of the parking area upwind and adjacent to the beach and adjacent to the picnic areas; they are the areas that will be in the highest demand by multiple user groups and fill up first on busy weekends. Boardsailing is an equipment intensive sport, requiring rigging-friendly surfaces adjacent to one’s vehicle, and thus these are the areas that are the only practical locations for parking/rigging.

The eastern half of the turf parking area would be replaced by a single large asphalt parking lot, similar to what you would find at a shopping center. This lot would be devoid of adjacency to grass and would be impractical for boardsailing parking/rigging. Likewise, the southern portion of existing parking/rigging will be reduced substantially, essentially eliminating much of the rigging-friendly grass surface. These are also significant impacts which should be addressed by more intensive review during an EA.

Our following comments focus on those components of the “Recommended Categorical Exclusion – DRAFT” document (CE Document) which we find to be inaccurate, misleading and/or missing, and we hereby request that the CE Document be revised to reflect the following concerns:

Cover Page: Categorical Exclusion (CE) Justifications

C.8. – Replacement in kind of minor structures and facilities with little or no change in location, capacity or appearance.

Concern: Please list and provide direct examples of those minor structures and facilities which are proposed to be replaced with little or no change in location, capacity or appearance. Your 2015 NPS NEPA Handbook gives examples, surely you can, too!

Concern: If this justification is applied across the board to the proposed action, then the proposed design is actually a change of location of parking, capacity of parking, and appearance of the entire parking area!

C.18. – Construction of minor structures, including small improved parking lots, in previously disturbed or developed areas.

Concern: Please list and provide direct examples of those minor structures, including small improved parking lots, in previously disturbed or developed areas. Your 2015 NPS NEPA Handbook provides guidance such that an example of a ‘small improved parking lot’ would be a “small-scale development of new parking spaces adjacent to existing parking areas”. Somehow the addition of 53,225 ft² of pavement and 189 paved parking spaces does not equate to ‘small’! Please explain.

C.9. – Repair, resurfacing, striping, installation of traffic control devices, repair/replacement of guardrails, etc. on existing roads.

Concern: Please explain why this category is not used. If you used this as CE justification for a component of your ‘Centennial Repair Project’, such as new striping, installation of speed bumps for traffic control, repair of existing pavement or resurfacing of the turf parking with pavement, you will find in your guidance that this CE applies to road maintenance, rehabilitation, repaving, and reconstruction on existing roads within the existing road prism. It is suggested that this applicable CE justification would disqualify your proposed project from a CE. Please explain.

C.16. – Landscaping and landscape maintenance in previously disturbed or developed areas.

Concern: The terms ‘repair’ and ‘redesign/reconfiguration’ have distinctly different meanings. If NPS were to reconsider the propriety of its approach to spending \$2.5 Million in ‘Repair Grant Funds’ on its proposed “Redesign/Reconfiguration” of Crissy East Beach, and instead keep and honor its word from 2012 and spend the funds on actual repair by implementing its overdue “Crissy Refresh” project, it could use all of the above CE justifications with full integrity and clear conscious, and likely public support, and begin ‘Repair/Refresh’ construction in late 2016.

Section B -Background:

The first sentence of the second paragraph begins with “Crissy stormwater Field”....

Concern: Please clarify!

Reference is made that the East Beach Parking Area is reaching the end of its useful life and is now in fair to poor condition due to heavy public use, popularity and years of degradation.

Concern: Be honest about all the causes of the degradation – including lack of watering and annual reseeded, as was the norm for the first 10 plus years when it functioned well! Additionally, it is a stretch to say that the area is at the end of its useful life. For the most part, the restroom turf area is in decent condition; however, the lack of water and annual maintenance on two of the grassy areas in particular has left them vulnerable to the winds and thus almost devoid of any soil in the western turf panel. Addressing the condition of the turf and perhaps restricting parking to a strip around the perimeter of these turf areas could provide a path forward that would reduce maintenance and maintain the current layout.

Additionally, this section references an inefficient layout.

Concern: What is specifically inefficient about this layout? The busy weekend of 4/16/2016 and 4/17/2016 saw abnormally warm temperatures on both days. There were many vehicles but people found ways to park in tandem, ask their neighbors if they could slide their car over, and overall found creative ways to add capacity. Our experience is that on the handful of days where the lot is used at close to capacity, users generally find ways to make it work with little to no conflict.

Section C. Purpose, Need and Objectives

Purpose and Need:

Crissy East Beach is one of the few water-contact-recreation access points on San Francisco Bay, it is not a Promenade Parking lot.

Concern: The turf areas are not overflow parking; they were designed and constructed as a daily recreational asset for boardsailing and other water access sport vehicle parking and equipment assembly.

It is important to note here that from the beginning, the majority of Crissy Field East Beach was designed as a recreational area with a pervious, parking/rigging-friendly surface; it was not intended to be or designed to be just a parking Lot! Throughout the document, ‘turf panels’ and ‘informal turf parking areas’ are referred to as “**overflow** turf lawn panels”; this couldn’t be further from the truth. All of the turf parking was meant to be daily parking/rigging and parking/recreation surfaces, not overflow or special event parking. Please correct these mis-statements.

The second paragraph of this section states, “The purpose and need of this project are to address critical repairs and deferred maintenance.” We take no issue with this statement and applaud the NPS for securing funding to address repairs and deferred maintenance.

Concern: However, this does not necessitate a radical redesign of the parking area. This section references improving visitor experience and safety. It is unclear how the redesign relates to these particular issues; please clarify!

This section references “changed conditions” but does not describe in any detail what these changed conditions are. This section references a need to improve safety but there are no statistics provided to indicate that there are pressing safety issues that need to be addressed. Please clarify!

As regular users of this area, we have not seen much in the way of unsafe conditions here. Folks walk around there area without issue. Occasionally, there are drivers who do not respect the discretion needed in a parking lot. We would be fully supportive of traffic calming measures such as speed bumps to slow vehicular speeds in this area.

This section indicates that the solution to the stated “purpose and need” will require a need to “eliminate areas of disrepair”; “provide for another 10-15 year lifespan”; “improve visitor experience and safety”; and “decrease future maintenance requirements.” Reference is made to the tripping hazards of the grass areas. Is there any documentation of this “tripping hazard”? This one item is mentioned repeatedly throughout this document but is unsubstantiated with any empirical evidence that this is in fact true or problematic. Please clarify!

Is the current proposed plan the only means to achieve the purpose and need and its associated sub-goals? We have seen only one plan that was minimally modified to address some of our concerns. We have proposed several alternate approaches that would address both the purpose and need as well as the other desires listed here without completely reconfiguring the entire parking area. Have these been seriously considered as a means to address deferred maintenance without eliminating the wonderful character of this place? Are there options to address the deferred maintenance without adding other non-related design items such as widening the promenade? This section ends with a statement that the goal is to “continue to support diverse recreational uses, including boardsailing and picnicking.” What has been designed thus far would not support boardsailing and would represent a significant degradation of our access to the bay. Please clarify!

Objectives:

Parking Area Improvements

Improve visitor experience and address safety and wayfinding concerns

Concern: Please clarify safety and wayfinding concerns!

Accommodate parking for 400 cars, which remains the same as the current parking count and the current condition.

Concern: Crissy East Beach was planned and designed to accommodate 500 parking spaces; at present the Temporary Crissy Field Center located at the east end blocks approximately 100 of those spaces. What are the plans for removing the Temporary Center once Doyle Drive is completed in 2016? It is our position that no redesign or reconfiguration of the area be conducted without including the fate and future of the Temporary Center. Please clarify!

Improve drainage at East Beach and treat runoff from the parking lot before entering drains.

Concern: By paving over 53,225 ft² of presently pervious surfaces, stormwater runoff increases significantly. As in most things, when solving a problem one creates a new problem, which in this case may well be an increase in standing water in the swales and thus mosquito breeding and infestation. With the concerns of the new mosquito-borne viruses, please address this concern!

Limit use of turf parking to reduce the amount of area to be maintained for informal parking and allow lawn areas to thrive

Concern: Please explain how this will be accomplished and where!

Make parking layout more efficient.

Concern: By forcing more and more boardsailing vehicles into the large paved parking lot, moving equipment from the vehicle to a grass rigging location may likely result in safety challenges; and safety issues for those in the way during high winds and equipment movement.

Section D-Development of Proposal (Pre-Proposal Scoping)

This section references a process of developing and reviewing alternatives; however the public has only seen one option. Minor modifications were made to this one option.

Concern: People (boardsailors or otherwise) love the current layout and support addressing the deferred maintenance but not the redesign. This should be included.

Section E - Proposed Action

The project team has developed a proposal to **repair** the Crissy Field Promenade and East Beach Parking Area.

Item 1- Replacement of the promenade material and repair of damage.

Concern: We take no issue with the proposed repairs to the promenade, however we believe that widening the promenade from 20 to 30 feet in the East Beach area will exacerbate boardsailing crossing issues and it ultimately will not resolve congestion for those using it.

Item 2- Reconfiguration of the East Beach Parking

Concern: We take serious issue with the proposed reconfiguration of East Beach parking, and the fact that it is also referred to as repair. Since when are redesign/reconfiguration and repair/replace of like kind the same activity. They are not. Please address!

The current proposal does not address the needs of the boardsailing community and is a violation of both the letter and spirit of prior environmental review processes. Those prior agreements need to be respected and rushing this design forward will serve to both erode the quality of the East Beach Area as well as the mutual trust between stakeholders and GGNRA going forward. The original design supported 500 parking spaces. The Temporary Crissy Field Center displaced space for approximately 100 of those cars. The proposed design would result in the further reduction of 75 spaces in the western half of the area and elimination of grass areas to rig in the eastern half. SFBA has offered several alternatives that would maintain the current configuration and address issues of maintenance, safety, and stormwater. These alternatives need to be pursued further!

Additionally, the parking closest to the water was intended 1) to assist those who are less mobile to be able to enjoy the Bay from the comfort and warmth of their vehicle, and 2) to enable all users to monitor and enjoy the visual experience of boardsailing from the needed warmth of a vehicle. Anyone who thinks that a bench alone at the promenade's edge will suffice has not spent much time at Crissy Field! Please address! We would also like to know what the ADA community thinks. Also, we assume that in the third paragraph it was supposed to read 'ADA standards', vice ABA!

Item 3- Enhance planted buffer between Promenade and East Beach Parking

Concern: The planted buffer between the promenade and East Beach Parking has absolutely nothing to do with the purpose and need of this project. We would agree that there might be some visual benefit to this but it is clear that blowing sand has been a problem in this area. Windy days in the spring and summer result in large clouds of blowing sand out of the west. Even more problematic are the handful of days in the fall and winter when the wind blows directly on shore from the north. Sand is blown directly from the beach and deposited into the grass. No matter what type of grass you plant here, the zone will be subject to that deposition of sand. In the spirit of reducing the need for maintenance, we recommend keeping the small buffer but replacing the grass with some sort of native hedge. You would gain some type of screening and avoid a larger grass area regularly filling up with sand. The widened planted buffer and widened promenade that have been proposed create serious limitations to parking area solutions and need to be reconsidered as irrelevant to the purpose and need of this project.

We are also concerned with the plans for stormwater collection and treatment in the planted buffer, and again with the potential increase in standing water in the swales and thus mosquito breeding and infestation.

Section F-There is no section F. During this accelerated and rushed process, has this document been fully proofread and vetted prior to public comment?

Section G - Land Management Plan

The proposed action claims to be consistent with the Presidio General Management Plan (GMPA 1994.) An excerpt from this document specifically calls for “Boardsailors will use the offshore waters at the east end of the promenade and access to the beach will be provided for them with nearby parking and rigging areas.”

Concern: The proposed project will erode the quality of both the access and nearby parking and rigging areas. We have attempted on multiple occasions to communicate the specific needs related to pursuit of our recreational activity. Boardsailing gear is bulky. Many of us carry multiple boards, sails, masts, fins, etc. It is imperative that sufficient space be provided to allow for parking adjacent to grass area to rig our gear. Running back and forth across a large asphalt lot is both impractical and potentially unsafe. Additionally, sailing at the mouth of the SF Bay has certain inherent risks. The strong winds and tides can potentially be dangerous to sailors. Gear breakage, sudden decrease of wind, and other unforeseen factors can potentially put individuals on the bay in danger. As such, our entire community collectively looks out for each other. Annual safety meetings at the St. Francis Yacht Club and continual outreach to and coordination with the US Coast Guard are part of our mission. However, the ability to visually see those in distress from the parking area has been a critical factor in maintaining a proud history of safety at this area. Both the requirements of parking adjacent to grass and ability to visually view the conditions on the bay were important criteria that were addressed during the initial design and build out of this parking area over 15 years ago.

Section H-Impact Assessment (Item 3-NPS Screening Form)

Resource Effects to Consider: There are issues in this section that are unclear or are inconsistent with statements in other parts of this document.

1. Human Health and Safety:

Concern: This document claims that the improvements to the parking area are intended to improve visitor safety but it is unclear how that is met. As previously stated, our observation is that the current parking lot is indeed an extremely safe place. Are there any statistics that support the belief that the current area is unsafe? Anecdotally, our observation is that the current layout has proved to be extremely safe with few to no incidents over the last 15 years. Interestingly enough, this section declares that the impact to public safety would be non-significant. We would agree with this finding. The proposed action would not change the level of safety. Please clarify this contradiction with previous statements about project goals and efforts.

2. Visitor Use and Experience - Recreation Resources:

Concern: This document claims that improvements to the parking area will improve visitor experience. It is unclear how that would be true. For the vast majority of users (the 325 cars stuck in a large asphalt parking lot) the arrival experience of coming to Crissy Field will not be improved but rather degraded; what ever happened to encouraging discovery, to making choices about where to park your first time, or the first time you realize that parking into the wind will prevent you from ripping your car door off? For board sailors stuck in this large asphalt lot, the visitor experience will be awful. To assert that the impact is non-significant is disingenuous.

3. Water Quality

Concerns: The proposed action goes to great lengths to develop swales to catch stormwater runoff of a large asphalt parking lot that would replace the pervious turf that currently exists. The impact is listed as non-significant. Wouldn't maintaining a layout that addresses stormwater runoff adequately via more pervious paving and more turf be a more cost effective solution than the expense of such a major redesign?

4. Sea Level Rise - Climate Change

Concern: Why is this section listed as non-significant? Section B specifically indicates that this project will address climate change. In what way does it do so? Section C-Objectives cites the need of an increased planted buffer zone between the promenade and parking to allow buffer from potential storm surge overwash. Are there any documented occurrences of this? Most of us have observed Crissy over the years during large storms, king tides, and even the tsunami from Japan a few years ago and have never seen the water anywhere close to overrunning the beach.

Park Specific Environmental Screening Questions

Item 3: Introduce non-historic elements into a historic setting, structure or environment.

Concern: The answer should be YES... the introduction of 53,225 ft² of non-historic pavement into what is and was green turf. The East Beach Parking Area is not just an existing parking lot, it is a sophisticated recreational surface planned, designed and constructed to accommodate the assembly of fragile, high-performance boardsailing and sailing equipment and daily vehicle access and parking.

Items 6 and 12: Creating a public safety or health hazard

Concern: There will likely be greater congestion in the central parking lot and unsafe to be unloading and carrying gear and rigs and boards from the parking lot amongst moving vehicles to the friendly grass surfaces.

Items 11 and 13: Affect current or planned visitor services, recreational resources, access or available parking? Change or impede accessibility?

Concern: This project will eliminate 189 existing boardsailing parking spaces with immediately adjacent rigging-friendly surfaces, which is a significant impediment to accessibility!

Item 16: Alter scenic features, viewsheds, be visually intrusive or add to a degraded visual condition?

Concern: This proposal would negatively impact scenic features and understates the visual impact of a large asphalt parking lot as minimal. It references the precedent setting use of asphalt in a parking lot but neglects to address the unique quality of this specific location in a national park adjacent to the San Francisco Bay. The current layout is not a parking lot but rather a recreational surface and parking area. What has been proposed is more analagous to what you would see next to a shopping mall and not in the crown jewel of a national park.

Additionally, this project essentially eliminates the existing ADA compatible water viewshed from front-row parking. And because it is cold and damp here most of the year, it also eliminates the ability for Boardsailing safety monitors to watch for those in trouble from the warmth and safety of a vehicle.

Issues and Concerns

Public Access and Visitor Experience:

Concern: The document references the “highly regarded board sailing area” in the existing conditions and then claims “visitor access and activities will remain unchanged with the implementation of the project” that will “temporary inconvenience visitors.” As already stated in this letter, the proposed action will significantly change access for board sailors to park, rig, and launch at Crissy Field. The inconvenience, particularly on the weekend, will not be temporary but permanent, and it will make the East Beach unworkable for many of us as a viable boardsailing option.

Beyond the specific impacts to boardsailing, this section talks about East Beach as a parking lot that serves the beach, promenade, and other areas when in reality the recreational parking/rigging AREA is in many cases a destination in-and-of itself. People enjoying the outdoors while picnicking or setting up volleyball on the informal turf is how the space is used. The place is a social gathering space as currently designed and this configurations works well for the vast majority of visitors. The end of this section claims that visitor experience would be enhanced by additional lawn areas when in reality the proposed action reduces the area of lawn/turf by over 52,000 square feet.

Traffic and Parking:

Concern: At the end of the existing conditions section, this document references the turf area at the south portion of the parking area. “This area is open with no indication of individual parking spaces; users park at will. Typically parking in this area is oriented in the same direction as the paved parking abutting it.” We would agree with this observation, which contradicts much of the document’s assertions that informal turf parking is somehow inefficient or confusing to users! Despite the lack of designated stalls or structured parking, most people seem to naturally park efficiently in these areas just like they would on a structured lot. Boardsailors, especially, tend to work together to accommodate one another.

Public Safety:

Concern: There is no rationale that defining pedestrian walkways, drive aisles, and parking spaces would reduce conflicts between user groups; on the contrary, drivers tend to become more disturbed when an adjacent vehicle hogs more than one space or does not park straight within his or her parking lot pavement stripes. As mentioned earlier, this item has absolutely nothing to do with stated purpose and need and attempts to “solve” a problem that SFBA believes currently does not exist at East Beach.

In Closing:

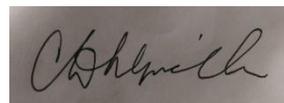
While SFBA appreciates the magnificent task remaining before you in the implementation of a Crissy Field Centennial Repair Project, we are also of the position that any reduction in existing parking levels at the western end of East Beach would be a diminution of public coastal access and recreation. As a result, SFBA strongly encourages either a more formal Crissy East Beach Reconfiguration planning process and an Environmental Assessment of the options, or more preferably a recommitment to repairing, ‘refreshing’ and perhaps slightly improving our existing configuration to reduce some of the existing maintenance and operational challenges.

True to the belief that human beings are only fully human when they play, given the intense work ethic of people in the Bay Area and the very little, precious time we have to get out on the water after work and on weekends, SFBA is more committed than ever to working together with GGNRA and the GGNPC in a fast-track effort to put the shine back-on Crissy Field East Beach. If you have any questions or would like further clarification regarding our comments, please let us know.

Sincerely,



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