



## SIERRA CLUB MARIN GROUP

GGNRA SECTION C/O GORDON BENNETT

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April 29, 2004

Superintendent, Golden Gate National Recreation Area  
Building 201, Fort Mason, San Francisco, CA 94123  
Attn: Karen Cantwell, Environmental Compliance Office

Dear Ms. Cantwell:

The Sierra Club, on behalf of our 7000 Marin County Members wishes to submit the following comment on the Environmental Assessment (EA) for the Marin Mammal Center Site and Facilities Improvement in the Marin Headlands of the Golden Gate National Recreation Area.

We support the Marine Mammal Center and this Project's Preferred Alternative #2 to upgrade their facilities. However, we continue to be concerned about potential traffic impacts, which this EA appears to greatly under-estimate and for which it proposes no mitigations. Alternative 2 contemplates an increase in public parking spaces from 13 to 43 and a significant upgrade of visitor amenities (see comparison table pg 2). Nevertheless EA page IV-27 notes "*using best professional judgment it is estimated that under Alternative 2, an increase of up to ten visitors might be expected on peak days.*" The Sierra Club does not believe "ten" is a reasonable estimate of increased visitation, given the considerable effort and money that this Project plans for new visitor amenities and programs.

Furthermore the EA compares the traffic impacts from these "ten" additional visitors to the current conditions on Bunker Road and determines that the project impact of "less than a 0.10 percent increase" would be considered "negligible." Rather than comparing to Bunker Road conditions, the Sierra Club believes that the comparison should be made to current conditions at the Bunker/Alexander intersection and should include cumulative impacts from the expansion of the Discovery Museum and the Fort Baker Project. We believe that this intersection, after cumulative impacts, is likely to operate at an unacceptable Level of Service (LOS) during peak days, possibly backing traffic up onto Alexander and the 101 Freeway. Consequently, we believe that even the traffic impacts from the greatly under-estimated "ten" additional visitors may be significant at this intersection. We also note that the City of Sausalito has raised significant concerns about traffic impacts at this intersection from the proposed nearby the Fort Baker Project.

Therefore, The Sierra Club urges GGNRA to add mitigations into this EA that would require traffic monitoring programs to determine the extent to which this EA's "professional judgment" of "ten" additional peak day visitors is accurate and

also the extent to which this Project's actual peak day visitor count may reduce the Level of Service at the Bunker/Alexander intersection. If this traffic monitoring shows that the addition to daily peak visitation exceeds "ten," then Traffic Demand Management programs and/or capital improvements to the intersection would be required mitigations to restore the visitation to the "ten" figure. Additionally, if the actual visitation, at whatever level, pushes the operation of the Bunker/Alexander intersection into a lower Level of Service, then Traffic Demand Management programs and/or capital improvements to the intersection would be required to restore the intersection its current (no project) Level of Service. We urge GGNRA not to make a Finding of No Significant Impact for this project without these traffic mitigations.

Sincerely,

Gordon Bennett, Sierra Club-Marin Group

cc: City of Sausalito

#### COMPARISON OF VISITOR AMENTIES

CURRENT (Page III-26)	PROPOSED (Pg IV-36)
<p><i>"The Marine Mammal Center is currently under-sized and improperly designed to adequately provide educational programs to fulfill The Center's mission. Currently the Center provides three interpretive panels with limited information for the visitor. The facility lacks a physical sense of arrival for visitors and provides limited orientation informational for the visitor [to] navigate the site. The Center lacks indoor or sheltered classroom space at the treatment site, marine mammal pens are not configured in a manner that allows visitors to view the animals without disturbing and potentially habituating the animals, and parking arrangements are not safe or convenient. "Page II-6" Primary accommodation for visitor parking would continue to be the 13 parallel parking spaces located along the access drive."</i></p>	<p><i>"The Marine Mammal Center Project would include many features designed to further the Center's mission related to public education and outreach. Alternative #2 would provide improved landscaping and an entry porch designed to promote visitors' sense of arrival. Educational facilities and opportunities for science-abased educational programming would be improved through the development of a Marine Science Community Education Center and educational amphitheatre. Interactive laboratory and indoor classroom programs would be available for school programs. Visitors to The Center would enter a discovery room, which would orient visitors to the Marine Mammal Center and the natural history of marine mammals. The visitor experience would be improved through the development of a public observation deck over the pens and pools and facilities designed with observation windows with views of the laboratory, necropsy, chart room, and marine mammal food preparation area. Exhibits would interpret treatment protocols, disease research, human interaction, and rescue and release functions. Approximately 43 public parking spaces would be conveniently provided at the western end of the site and along the access road."</i></p>