



SAN FRANCISCO BOARDSAILING ASSOCIATION

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

Henry Wong, Remedial Project Manager
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January 19, 2007

James B. Sullivan
Navy BRAC PMO West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Re. draft Action Memorandum / Interim Remediation Action Plan (AM/IRAP)
draft Negative Declaration pursuant to CEQA (Negative Declaration)
Treasure Island Housing Area, Site 12 / Former Navy Station Treasure Island

Dear Sir/Madam,

I am writing on behalf of the members of the San Francisco Boardsailing Association. The SFBA is a 1,600-member non-profit organization that promotes public access and safety for the windsurfing and boardsailing community.

Following a review of the above referenced Draft Action Plan / Interim Remediation Action Plan (AM/IRAP) and draft Negative Declaration pursuant to CEQA (Negative Declaration) it has become clear that the proposed action will have a significant environmental impact, specifically to the recreational activity of windsurfing at Treasure Island (TI). The actions called for under the AM/IRAP would effectively shut down windsurfing at TI by eliminating the parking area used by windsurfers and by blocking access to the launch areas that allow windsurfers to reach the water. The majority of these areas do not lie within the remediation area, but the parties who developed the remediation plan found it convenient to use these areas for loading, storage or staging. It is SFBA's hope that the AM/IRAP can be modified to eliminate the significant impact to recreation by finding other areas that can be used for loading, storage and staging.

Location of Recreational Impacts

An exhibit to both the AM/IRAP and the Negative Declaration entitled 'Figure 5 - Truck Staging and Route Map' shows an area on the map of TI that is shaded orange. The key on the exhibit identifies the area shaded in orange as a "truck loading area for debris area." The location in question appears to be identified on the 'Site Location Map' as area T109. The area shaded in orange/mustard is known as the boat ramp parking lot to recreational users of the bay including windsurfers, kayakers, and fishermen. Windsurfers and others park in this lot in order to have access to the waters of the San Francisco Bay.



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Exerpt - Truck Staging and Route Map



Excerpt - Site Location Map

Windsurfers use an unimproved launch on the north side of the boat ramp parking lot that is approximately 50' east of the abandoned transformer pad (Launch 1) and the boat ramp (Launch 2) for launching and landing. In addition, many windsurfers have traditionally rigged their equipment on the dry grassy area behind building 1235 and 1237 (Rigging Area). The Rigging Area lies within the east end of clean up area SWDA 1231/1233. A number of years ago, TIDA staff had a portion of fence between the Rigging Area and the perimeter road so that windsurfers could carry their rigged gear to the boat ramp without impediment. The various sites mentioned are delineated in Figure 1 below.



Figure 1 - Windsurfing Use Areas at Treasure Island



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Also visible in Figure 1 is an portable toilet that is located along the wet side of the parking area. SFBA has covered the cost of placing a portable toilet on site during the season because of the popularity of the site. During the last windsurfing season, this was the only unimproved site where SFBA chose to incur the expense of providing a portable toilet.

WINDSURFING USE AT TREASURE ISLAND



Treasure Island Windsurf Sailing Area

Treasure Island is a significant regional resource for the windsurfing community. The site in question has been used continuously by windsurfers more than 10 years. Treasure Island has been growing in popularity and importance as a windsurfing spot as windsurfers have learned that there are many days when the wind conditions at Treasure Island are ideal even though the wind at most other sites is too light for most windsurfers. During weekends when the wind conditions are ideal it is normal for the boat ramp parking lot to be nearly full with the vehicles of windsurfers with peak vehicle counts at or above 60 and peak users at or above 65-70. There are some days when the wind conditions at TI are ideal for most users and the wind conditions at other regional sites such as Crissy Field or Berkeley are not sufficient to justify launching. Most of the users of Treasure Island primarily use boards and sails that are designed for high wind conditions. This equipment may not provide the power or flotation to allow for use in light winds. Launching at Treasure Island enables many windsurfers to safely access the waters that lie between Treasure Island, Angel Island, and Alcatraz. The launch at Treasure Island has been used to stage races and the sailing site is also used by professional windsurfers as a site to train for national and international competition.



Rigging Area



Sailing Area



Launch Area



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In light of the exceptional windsurfing access at the north end of Treasure Island, the area is recognized by the Bay Conservation and Development Commission (BCDC) as location where access for windsurfing and other bay users shall be provided. Bay Plan Map 4, as approved by BCDC, identifies the north end of TI as a location where there shall be the provision of “parking and water access for users of small watercraft.” While the San Francisco Bay now has over 200 miles of publicly accessible shoreline, there less than a dozen sites along those shores where facilities and site conditions allow for the kind of superior access that can frequently attract large numbers of windsurfers (peak use of 50 or more). The site has also been designated as a location for the provision of windsurfing access in the conceptual redevelopment plans prepared by Treasure Island Community Development (TICD). The conceptual plan prepared by TICD also anticipate that there will be a second windsurf access point to the west of the boat ramp in the future, but access in that area is currently infeasible due to the lack of parking, lack of a means to get the equipment to the shoreline, and the lack of any ramp or walkway that would allow one to safely cross the rip rap to the waterline. Access on the west side of the island is infeasible because winds blowing directly or almost directly on shore push launching windsurfers back into the rip rap. Access on the east or south side of the island is infeasible due to lack of sufficient wind.

ALTERNATIVES TO AVOID IMPACTS

- Relocating the "truck loading area for debris area" and maintaining vehicular access to the boat ramp parking lot could preserve access with nominal impact. The loss of the rigging area that lies in or near SWDA 1231/1232 may not be significant because windsurfers can and do rig in the parking lot. There appear to be a number of open areas on Treasure Island that could be used as an alternative site for the truck loading area for debris area:
 - Shift the "truck loading area for debris area" from the boat ramp parking lot to an area within the areas already designated under the remediation plan for soil stockpile and truck loading. The boat ramp parking lot accounts for less than 1/2 an acre out of the approximately 6.5 acres that have been set aside in the remediation plan for soil storage, debris storage or truck loading. This means that the lot accounts for about 12% of the space set aside.
 - Shift the "truck loading area for debris area" from the boat ramp parking lot to another open area that is not currently within areas already designated under the remediation plan for soil stockpile and truck loading. Immediately adjacent to the other soil stockpile and storage areas are large open areas that do not appear to be in use (e.g. the area south of 13th between Avenue H and Avenue I and the area bounded by 13th, 11th, Avenue E and Avenue H. Using only a portion of one of these areas could replace any area not used in the boat ramp parking lot while allowing a buffer to still be maintained between the loading area and residential uses.



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for facilities and connecting waterways to be open to all. Further such liberal provision is provided in the MacAteer-Petris Act and in the Bay Plan. The former provides in Section 66602: that "... that existing public access to the shoreline and waters of the San Francisco Bay is inadequate and that maximum feasible public access, consistent with a proposed project, should be provided." The Bay Plan Map 4 identifies the recreational site at Treasure Island and provides the following language in the map notes, "Provide parking and water access for users of small watercraft at north end of Treasure Island."

Please feel free to contact me with any questions or for any clarification. I have attached an earlier letter from March 2002 that more fully describes the windsurfing use and access issues.

Sincerely,

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Please copy written responses to :

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