



CITY OF SAUSALITO

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May 18, 2015

Superintendent
Golden Gate National Recreation Area
Attn: Alcatraz Ferry Embarkation Draft EIS
Fort Mason, Building 201
San Francisco, CA 94123-0022

Re: Comments on the Draft Environmental Impact Statement for Alcatraz Ferry Embarkation Project

To Whom It May Concern:

The City of Sausalito (City) submits these comments on the Draft Environmental Impact Statement (DEIS) for the Alcatraz Ferry Embarkation Project (Project) proposed by the National Park Service (NPS). The DEIS largely addresses the selection of three alternative embarkation sites on the San Francisco waterfront to serve the Park's ferry operations to Alcatraz Island.

NPS proposes, as a mandatory component of the three Project alternatives, Special Ferry Service at Fort Baker (hereafter, Fort Baker Ferry Service). According to the DEIS, the Fort Baker Ferry Service component will involve the development of a ferry berth at Fort Baker and the operation of a ferry for "special events, occasional excursions, or special occasional service" between other NPS parks and the San Francisco waterfront.

No qualification is provided as to what "occasional" means in terms of number of annual excursions, and no upper limit is provided. "Occasional" is later characterized in the DEIS as "intermittent" with trip numbers apparently at a "low level relative to existing activity in the San Francisco] Bay." (DEIS, p. 375.)

Development of the Fort Baker Ferry Service will also involve the virtual re-construction of the existing 1930's era, 400-foot long concrete pier at Fort Baker, which the DEIS describes as having "significant damage and deterioration." (DEIS, p. 62.)

The first step in any such development is adequate review under the National Environmental Policy Act (NEPA). Unfortunately, after a close review of the DEIS, it is apparent that the Fort Baker Ferry Service project component and NPS's environmental review of it in the DEIS is flawed. The DEIS fails to include essential facts necessary to accurately and completely describe the Fort Baker Ferry Service project component; it fails to provide a factual basis for critical conclusions contained in the DEIS; it relies on misleading assumptions; and it understates substantially the potential impacts of the Fort Baker Ferry Service component of the Project.

The City urges NPS to carefully review the comments below and correct the deficiencies identified before moving forward with any further consideration of the Fort Baker Ferry Service

component of the Project. NPS, in particular, must carefully weigh the relative benefits of the Project-based on a full and accurate understanding of the scope and effects of the Project before committing potentially millions of dollars in federal subsidies for water-based transportation from Fort Baker to the San Francisco waterfront. Before irreversibly committing resources to such a project component, NPS owes the public a full, accurate and well-supported analysis of its environmental impacts on Fort Baker and the surrounding environment.

THE CITY, AS A CRITICAL STEWARD OF THE RICHARDSON BAY, HAS A STRONG BENEFICIAL INTEREST IN ENSURING COMPLIANCE WITH NEPA

The City of Sausalito has had a long record of support for the recreational use of Fort Baker. In 1998, the City informed then Superintendent Brian O'Neil of its support for the transfer of Fort Baker from the Army to the National Park Service.

However, that support has also been balanced with the concern that Fort Baker retains its historic heritage. We have urged the NPS to be sure the Fort's facilities are sized in a way that preserves its historic resources and enhances sensitive environmental resources. In turn, NPS substantially reduced the originally proposed size of the conference center/lodge from 350 rooms to a maximum of 225 rooms.

The Project DEIS largely concerns itself with determining which of three piers on the San Francisco waterfront would be the best location for the NPS's ferry operation to Alcatraz Island. However, each of these alternatives includes, without exception, ferry operation from Fort Baker to the San Francisco waterfront and other potential stops at NPS facilities located in San Francisco Bay.

Simply put, we were shocked at this component of the Project. The City is gravely concerned that the Fort Baker-San Francisco leg of the Project foreshadows a significant increase in the intensity of use at Fort Baker. Once having constructed a ferry landing at Fort Baker at considerable cost, it is simply inevitable that pressure will mount for NPS to expand the service from what is now described as "occasional special events" to "regular" ferry service from Fort Baker to the San Francisco peninsula.

Indeed, the DEIS admits as much. The DEIS alludes to a staggering 100,000 annual ferry passenger visits to Fort Baker as part of a "circular route that serves multiple Park Service sites in the Bay." (Transportation and Circulation Study, p. 86.) In a seemingly innocuous statement, but in reality a glaring admission, the DEIS sets a baseline for noise at 14 ferry landings per day at Fort Baker resulting in 28 "events." (DEIS, p. 345.)

As you know, the City is the nearest urban center to Fort Baker. Currently, the City's streets, parking lots and public amenities are under mounting pressure from regional, national and international visitors traveling to Sausalito. The City continues to experience a staggering level of vehicles, bicycles and pedestrian traffic flowing into the Bridgeway corridor. Weekend bicycle traffic, largely arriving via the Golden Gate Bridge, has proved to be especially vexing, making many of our pedestrian walkways nearly impassable. In turn, cyclists often return to San Francisco via the ferry operations embarking from the Sausalito Ferry Landing. However, the number of returning cyclists is now outstripping the capacity of those ferries. Rather than relieve that overcrowding, we believe a ferry landing at Fort Baker will serve to increase visitors and bicycle traffic in Sausalito and further impact our community while also eroding the visitor experience at both Fort Baker and Sausalito.

For nearly 15 years since the transfer of Fort Baker to the NPS, the City has continued to invest in maintaining itself as one of the nation's most visited waterfront communities, drawing two million visitors annually. We believe that maintaining our community's quality of life directly benefits NPS, providing significant nearby amenities to lodge and conference guest at Cavallo.

Accordingly, we believe NPS and the City share a strong mutual interest in the economic vitality of the City's downtown waterfront, and we continue to support responsible use of Fort Baker that will sustain this treasured resource. But the Project proposes a substantial change to Fort Baker with the re-construction of the pier as a ferry landing and the inevitable advent that Fort Baker will become a destination for some 100,000 new visitors each year as one of the "other park sites within the Bay." (DEIS, pp. vii, viii, 48, 56, 61, 305, 309, 314.)

The City and Fort Baker stand to be significantly affected by the proposed Fort Baker Ferry Service component of the Project. Accordingly, the City is vitally interested that the environmental impacts of the Project's Fort Baker components are fully considered and actually mitigated to the fullest extent feasible.

THE DEIS FAILS TO ADEQUATELY AND COMPLETELY COMPLY WITH NEPA

1. The Project Description Does Not Adequately and Completely Describe the Actual Project

An accurate and complete project description, as required by NEPA, enables the public to understand the full scope of the Project and its potential effects on the environment. Here, the Project Description concerning Fort Baker Ferry Service component is incomplete, misleading and under-developed. As a result, it improperly minimizes the potential environmental impacts and artificially narrows the reasonable range of alternatives of the Project.

The Project's description improperly constrains the scope of the actual Project by narrowly defining the Fort Baker Ferry Service component as "[d]eveloping a ferry berth at Fort Baker for special service that could operate for special events, occasional excursions, or special occasional services between other parklands and the primary ferry embarkation site in San Francisco." (DEIS, p viii.)

However, as we drill down into the DEIS and its supporting studies, we learn the DEIS's mantra of "occasional" is seriously misleading. While the DEIS attempts to suggest that "regular" daily ferry service to Fort Baker is foreclosed, the DEIS actually sets the stage for just that level of service (without any attempt to identify or analyze the environmental impacts of such regular service).

Each of the primary alternatives for the San Francisco embarkation site includes a "third berth" component that will be used for cross-bay ferry service to other NPS Parklands – including Fort Baker. According to the DEIS,

"The Alcatraz ferry embarkation site may provide a valuable opportunity for cross-bay ferry service to other GGNRA parklands. Convenient transit connections to other GGNRA parklands, such as Fort Baker, are currently unavailable from the existing ferry embarkation site. NPS policy promotes alternative transportation access that is energy conserving and convenient, and that provides multiple travel options for visitors. Increasing numbers of park visitors choose to use transit, do not have an automobile, and perceive travel by

ferry as an enjoyable experience. The potential to add another (third) berth and promote additional special-event services to the ferry embarkation site would further enhance this opportunity.”

(DEIS, p. v.)

While seemingly consistent with the “occasional” Fort Baker ferry service portended in the bulk of the DEIS, this façade simply crumbles when we review the DEIS’s technical studies. Buried within the technical study concerning transportation and circulation, the NPS discloses that its San Francisco waterfront embarkation site’s “third berth” is expected to accommodate 100,000 annual passengers as part of a “circular” ferry route that takes visitors to a series of NPS parklands, including Fort Baker:

Although the ultimate use of this third berth is yet undefined, the additional ferry service could be a water taxi or a circular route that serves multiple Park Service sites in the Bay, for example. The Park Service has forecasted that this service would add up to 100,000 additional visitors annually”

(Transportation and Circulation Study, p. 86.)

The forecasted 100,000 passenger visits per year to Fort Baker via the “circular route” is, it appears, inadvertently confirmed in the DEIS discussion on noise and vibration. In analyzing noise and vibration impacts at Fort Baker, the DEIS specifically states that a “future (with Project) noise levels” analysis was performed “*based on a conservative estimate of 14 ferries per day.*” (DEIS, p. 345, emphasis added). The DEIS further states that “[t]he Fort Baker element of the Project is assumed to accommodate approximately 14 ferry trips, or 28 events per day.” (DEIS, p. 324.)

We are compelled to agree with the author. We concur that 14 ferries per day at Fort Baker is a conservative estimate and, to be fair, probably represents the outer limit of daily ferry service to Fort Baker. The technical study estimates that the “third berth” circular route service will generate 390 ferry passengers, on average, each day. However, this is only part of the story. NPS sponsored ferry excursions are subject to substantial peak demand on weekends, particularly Saturdays where demand appears to be more than twofold the average daily rate. Based on these peak demands, it is likely that ferry passenger visits to Fort Baker on a peak Saturday will exceed 1,000 passengers. The NPS’s current ferry concessionaire, Alcatraz Cruises, LLC, utilizes a ferry with capacity of 110 passengers for “cocktail” styled excursions which would appear to be consistent with the DEIS’s “special event” criteria accorded the “circular route” ferry service envisioned for Fort Baker and other NPS parklands. Assuming 80% to 90% passenger utilization during peak periods, 14 ferry landings during peak days at Fort Baker certainly appears to be in the reasonable range.

Summarizing our review, we believe that the DEIS fails to adequately describe the Project because it falsely characterizes the Fort Baker Ferry Service component as “occasional” when in fact the Fort Baker Ferry Service contemplates 100,000 passenger visits to Fort Baker with ferry service during peak days at as many as 14 ferry landings and 28 “events.” (DEIS, p. 324 and p. 345.) The DEIS should be revised to reflect this correction to the Project description.

2. The DEIS Improperly Piecemeals and Segments the Project, Thus Minimizing Impacts and Avoiding Necessary Mitigation

At the core of the DEIS's inadequacy is its surgical-like attempt to carefully characterize Project components as "undefined" when they will occur at Fort Baker and yet, simultaneously evaluate specific aspects of those same so-called "undefined" components when it comes to impacts on the San Francisco waterfront. The "third berth" with its 100,000 annual passengers is fully evaluated for its environmental impacts on the San Francisco peninsula. But two miles away across the San Francisco Bay, the DEIS posits that there are virtually no Fort Baker impacts from these very same ferry operations emanating from the third berth. Indeed, the third berth component with its 100,000 passengers and circular route impacts in Marin County has been piecemealed out of the Project, hiding behind the DEIS's phraseology of "occasional" and "intermittent" ferry service at Fort Baker. Does NPS seriously contend that 100,000 passengers are going someplace other than Fort Baker as these ferries embark on a "circular route" of the San Francisco Bay visiting every other NPS parkland? Simply put, NPS cannot leave analysis of such impacts to future review.

3. The DEIS Fails to Analyze a Reasonable Range of Feasible Alternatives

The purpose of the alternatives discussion in an EIS is to identify ways to reduce or avoid significant environmental effects. (42 U.S.C. § 4332(C)(iii).) NEPA requires the lead agency to "[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." (40 C.F.R. § 1502.14(a).)

Here, the DEIS's Alternative analysis fails in its attempt to address NEPA requirements because it makes no attempt to analyze a Project alternative that does not include the proposed Fort Baker Ferry Service. Because such an alternative would eliminate at least some of the environmental impacts of the Project while still fulfilling NPS's primary Project objective for a landing along the San Francisco waterfront, the DEIS's mandated embrace of the Fort Baker Ferry Service component for every alternative is improper and deprives the public and decision-makers of vital information required for an informed analysis.

An alternative that eliminates the Fort Baker Ferry Service is a feasible alternative that would meet the Project's primary objectives, while assuaging the concerns of the City that Fort Baker is taking a critical (and misguided) first step towards daily commercial and heightened weekend ferry operations. Yet the DEIS completely ignores this feasible alternative. The DEIS must be revised to include a reasonable range of alternatives, not just a binary choice between the Fort Baker Ferry Service or No Project.

4. The DEIS Fails to Properly Analyze Cumulative Impacts

Under NEPA, an adequate EIS may not consider a proposed action in isolation, but must consider its cumulative impacts, including the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions." (40 C.F.R. § 1508.7.)

Here, the DEIS purports to follow this approach but utterly fails to tie the new ferry landing at Fort Baker to the probable but "undefined" future project identified in the DEIS as the "circular route" generating 100,000 additional passenger visits to NPS parklands, including Fort Baker.

By failing to logically link the Fort Baker Ferry Service component to the “circular route” component, the DEIS fails to include major developments in and around Marin County in its cumulative impact analysis. These omissions must be remedied and the analysis revised to fully address the cumulative impacts of the Project.

5. The DEIS Does Not Properly Identify or Describe Significant Impacts of the Project

NEPA requires a “full and fair discussion of significant environmental impacts.” (40 C.F.R. § 1502.1; see also 42 U.S.C. § 4332 (C); 40 C.F.R. §, 1508.7.) This includes analysis of both direct and indirect environmental impacts of the proposed action. (40 C.F.R. § 1508.8.) Direct effects are caused by the action and occur at the same time and place. (40 C.F.R. § 1508.8(a).) Indirect effects are those caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. (See 40 C.F.R § 1508.8(b).) Both include “effects on natural resources and on the components, structures, and functioning of affected ecosystems,” as well as “aesthetic, historic, cultural, economic, social, or health [effects].” (*Id.*)

Because the DEIS relies on the demonstrably false premise that ferry service to Fort Baker will be “occasional,” the DEIS fundamentally fails to address the impacts of the Fort Baker Ferry Service and the surrounding area, thereby ignoring significant environmental, economic and public trust impacts.

a. Land Use

The Fort Baker Ferry Service component would include development of a ferry landing, which will include an extension of the existing pier and includes additional development of landside facilities. As a starting point, the DEIS’s land use analysis claims the proposed Fort Baker Ferry Service is “consistent with the general goals of the Fort Baker Plan.” (DEIS, p. 247.) At best, this is misleading. NPS promised that ferry service to Fort Baker would be subject to full environmental review when it wrote in the FEIS for the Fort Baker Plan:

“Detailed information on the type of service (i.e., size of boats, frequency of trips, land-side facilities, etc.) and subsequent environmental effects are unknown at this time. *Future plans for ferry service at Fort Baker would be subject to environmental review in accordance with NEPA, and mitigation would be developed as needed to reduce or avoid significant effects.* Because that analysis has not been prepared, the effectiveness of mitigation measures in reducing potential impacts is also unknown and could be considered potentially significant. Individually, the Proposed Action would have a less-than-significant, and in some instances beneficial, effect on water quality and biological resources. As a result, the Proposed Action would incrementally but not substantially contribute to this potentially significant impact. *The NPS would, however, mitigate the effects of ferry service to the greatest extent possible.* Use of a ferry would provide alternative transportation options for visitors of Fort Baker and would provide beneficial effects on traffic conditions.”

(Fort Baker Plan FEIS, October 1999, p. 5-3, emphasis added.)

By making the Fort Baker Ferry Service a mandatory component of the three Project alternatives, the full environmental alternative analysis to such ferry service has been completely short circuited. Indeed, development of a ferry landing at Fort Baker was a central component to the now replaced 1980 General Management Plan for the Golden Gate Recreation Area. The

FEIS to the Fort Baker Plan, in describing the "Waterfront/Fishing Pier" amenities offered under the then existing 1980 General Management Plan, stated:

"Wood bulkhead and riprap removed; new sandy beach and urban landscape created (6 acres). *Development of ferry landing and improvements* including railings, benches, comfort stations and fish cleaning stations on pier. Boat launching ramp repaired and resurfaced."

(Fort Baker Plan FEIS, October 1999, p. 2-4, emphasis added.)

Under this same heading, the FEIS to the Fort Baker Plan described the amenities offered by the 1999 Fort Baker Plan by stating:

"Wooden bulkhead and riprap removed; beach created; road relocated; 6-acre natural landscaped meadow; boardwalk; picnic area. Boat ramp retained; fishing pier improved (fish cleaning stations, railings, benches, information), restrooms provided. 170 parking spaces in three locations to serve waterfront users."

(Fort Baker Plan FEIS, October 1999, p. 2-4)

It is ironic that the Alcatraz Embarkation DEIS would now embrace the Fort Baker Ferry Service as being "consistent" with the Fort Baker Plan approved in 2005 when in fact the Fort Baker Ferry Service with 100,000 passenger visits is actually more "consistent" with the former 1980 General Management Plan it superseded. Indeed, in a November 23, 2004 letter to the San Francisco Bay Conservation and Development Commission titled "Revised Consistency Determination for the Fort Baker Plan," NPS does not even mention ferry service at Fort Baker. The letter does, however, repeatedly reference the "fishing pier" as part of the many critical recreational features at Fort Baker.

In 2005, the NPS pledged to "mitigate the effects of ferry service to the greatest extent possible." The DEIS dishonors this pledge. The DEIS should have honestly evaluated the Fort Baker Ferry Service's consistency with the goals and policies of the Fort Baker Plan and discussed the impacts of losing the pier as a visitor-friendly fishing pier with benches and railing. This use, which we have long considered a community asset and gathering place, will now be converted to another crowded ferry terminal. This intensity of use is simply not consistent with the Fort Baker Plan and the DEIS.

b. Traffic

Because the DEIS has cleverly separated the Fort Baker Ferry Service component of "occasional" ferry service from the 100,000 annual ferry passenger traveling on the "circular route" of NPS parklands including Fort Baker, the DEIS assures us the Project will not have substantial traffic and circulation impacts in Marin County. We disagree. These Project components will generate short-term, construction related traffic. Long-term traffic effects are also inevitable. However, the DEIS fails to even discuss the major roadways near Fort Baker that may be affected when these two Project elements are implemented. Why has this been glossed over? Because the DEIS simply hides behind the implicit vagueness of "occasional," "intermittent" and "special event." The DEIS discussion of traffic must be revised to take into account the 100,000 passenger visits to Fort Baker.

c. Air Quality

Air Quality is an important resource issue in the San Francisco Bay Area and is related to multiple factors, including transportation and circulation. The DEIS should have included an assessment of ambient air quality conditions as well as short-term (*i.e.*, construction) air quality impacts and long-term (*i.e.*, operational) regional air pollutant emissions from the ferry operation at Fort Baker that appears poised to include 100,000 annual visitors. The analysis should have identified sensitive receptors within and in the vicinity of Horseshoe Bay, discuss potential emissions of odors and/or hazardous air pollutants generated by stationary and area sources in the area. Instead, the DEIS simply skipped Fort Baker.

d. Noise and Vibration.

The DEIS appears to correctly analyze noise impact but does so because it explicitly acknowledges the actual level of ferry service to Fort Baker otherwise hidden in the veil of "occasional." The DEIS specifically states that the "future (with Project) noise levels" analysis was performed "*based on a conservative estimate of 14 ferries per day.*" (DEIS, p. 345, emphasis added). As a point of reference, 14 ferry landings a day actually exceeds the number of daily ferry landing at the commercial Sausalito Ferry Landing.

e. Geology, Soils and Seismicity

The proposed Fort Baker Ferry Service component includes landside improvements that currently include a pedestrian walkway but could ultimately include parking and transit connections to accommodate the "conservative estimate" of 14 ferry landings per day. The EIS should include a discussion of topographic alteration, land capability and coverage, dredging, soil stability, geologic/geomorphologic hazards and erosion potential and propose adequate mitigation measures (both temporary and permanent) for the eventual landside development components necessary to accommodate peak passenger disembarkments of as many as 1,000 passengers on peak days.

f. Water Quality and Hydrology

The Fort Baker Ferry Service component includes re-construction of the pier at the mouth of Horseshoe Bay and landside facility improvements adjacent to the bay. These project components could also affect existing drainage features in this area. Both pre- and post-construction impacts to these features should have been identified and analyzed in the DEIS. This will include non-point pollution sources from the component of the Project, potential contaminants, proposed source control methods, and proposed temporary and permanent BMPs to address potential impacts on water quality within Horseshoe Bay. The analysis of water-related impacts should have also considered potential motorized watercraft pollutants (*e.g.*, fuel constituents, combustion products) within the bay.

g. Biological Resources: Aquatic and Terrestrial

The DEIS section on aquatic and terrestrial biological resources fails because of the DEIS's insistence that the Fort Baker Ferry Service will be "intermittent and low level relative to existing vessel activity in the Bay." Federal and State endangered wildlife species, which include the Mission Blue Butterfly and host species lupine, among other species and their habitat, are known to inhabit coastal scrub areas at Fort Baker. The City respectfully submits that 14 daily ferry landings, 100,000 annual passengers and the associated development of

Fort Baker should be thoroughly analyzed for its impact on Federal and State endangered wildlife species.

h. Recreation and Visitor Use

The Fort Baker Ferry Landing Project component would, we acknowledge, provide a new tourist amenity at Fort Baker. However, once fully implemented with up to 14 ferry landings during peak days and 100,000 new visitors annually, it will inevitably push aside the fishing use on the pier that is a notable feature of the current Fort Baker Plan. This loss should be disclosed and its impacts evaluated

i. Public Services and Utilities

The public services and utilities section of the DEIS should have evaluated the potential effects of the Fort Baker Ferry Service component on power, solid waste collection and disposal, police services, emergency response (including U.S. Coast Guard) and fire protection services, water treatment and distribution, and wastewater collection using the proper baseline of 14 ferry landings per day and 100,000 additional visitors via the ferry service.

j. Hazardous Materials

The proposed project would involve the transportation of hazardous materials (e.g., fuel, paint) to the project site during construction and operation. The potential for these materials to be released into the environment at Horseshoe Bay should have been evaluated in the DEIS. The potential for site contamination should have been documented in the DEIS, and areas of potential soil or water contamination in the bay should have been described. In addition, the DEIS should have analyzed the potential effects on emergency response plans and fire hazard risks. The DEIS should have included a discussion of safety of passengers, crew, and other users of Horseshoe Bay resulting from the operation of a ferry service at Fort Baker along with proposed mitigation measures.

RECIRCULATION OF A SUBSTANTIALLY REVISED DRAFT EIS IS REQUIRED

For the reasons stated herein, the required analysis of the Project is defective under NEPA, undermining reasoned judgment on the Project and failing the required purposes of that law. (*See Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989) [noting NEPA's purposes are to ensure the agency will have detailed information on significant environmental impacts when it makes its decisions and to guarantee that this information will be available to a larger audience]; 40 C.F.R. §§ 1502.1, 1502.14.) Indeed, the Project DEIS so fundamentally fails to provide the necessary and accurate information required for informed decision-making under NEPA that no reasonable conclusions as to the soundness and value of the Project may be drawn from that document.


An EIS must be recirculated "if a draft statement is so inadequate as to preclude meaningful analysis." (40 C.F.R. § 1502.9 (a).) The DEIS fails because the Project description fails. We must insist that the DEIS be based on a Project description that explicitly acknowledges the 100,000 new visitors at Fort Baker and 14 ferry landings on peak days rather than resorting to vagueness with the use of the word "occasional" to avoid doing the hard work of analyzing impacts at Fort Baker.

The additional data and information that NPS must provide to correct the deficiencies in the DEIS, are significant. The new information may show that previously unanalyzed significant environmental impacts would result from the Project, or that the severity of the identified environmental impacts would be substantially increased unless mitigation measures are adopted. These are all grounds for recirculation. (See 40 C.F.R. § 1502.9 (a).) The City looks forward to an opportunity to review a substantially revised and recirculated DEIS.

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Thank you for this opportunity to comment on the DEIS and the Alcatraz Ferry Embarkation Project.

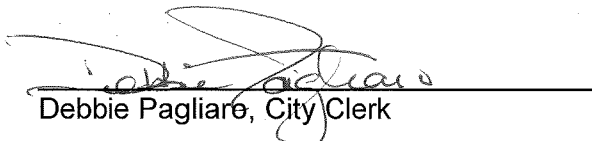
Very truly yours,



Tom Theodore, Mayor



Mary A. Wagner, City Attorney



Debbie Pagliaro, City Clerk