STAFF REPORT
SAUSALITO CITY COUNCIL

AGENDA TITLE
Comment letter on the Headlands Institute Campus Improvement and Expansion Plan Environmental Assessment

RECOMMENDATION
Authorize the City Manager to sign the attached letter to the National Parks Service.

SUMMARY
The City has been routed a copy of the Headlands Institute Campus Improvement and Expansion Plan Environmental Assessment (see **Attachment 1**, Executive Summary). The City has been given an opportunity to review the document and provide comments on the merits of the environmental document.

The potential impacts of the proposed Headlands Institute Campus Improvement and Expansion Plan related to traffic and increased sewer flows are not fully described and/or analyzed by the Environmental Assessment. Accordingly, a comment letter (see **Attachment 2**) has been drafted for the Council's consideration requesting a description and analysis on the project's traffic and sewer impacts on Sausalito.

STAFF RECOMMENDATION
Authorize the City manager to sign the attached letter to the National Parks Service.

ATTACHMENTS

1. Executive Summary
2. Draft Comment Letter

PREPARED BY:

Heidi Burns, AICP
Associate Planner

REVIEWED BY:

Jeremy Graves, AICP,
Community Development Director

SUBMITTED BY:

Adam W. Politzer
City Manager

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EXECUTIVE SUMMARY

Headlands Institute (HI), a partner with Golden Gate National Recreation Area (GGNRA) since 1977, is proposing to improve and expand their environmental education and conferencing campus. The HI campus is located in the Marin Headlands at Fort Cronkhite, which includes historic World War II and Cold War-era buildings. HI currently occupies eight historic structures and approximately seven acres within the Fort. HI focuses on field science education for kindergarten through twelfth grade students, and also functions as a youth and adult conferencing and retreat center. The mission of HI is "dedicated to teaching science and environmental education in nature's classroom to inspire a personal connection to the natural world and responsible actions to sustain it" (YNI n.d.:17).

This environmental assessment (EA) describes and analyzes four alternatives for the improvement and expansion of the HI campus.

Purpose and Need for Action

The *purpose* of the project is to provide state-of-the-art on-site environmental education services that meet an increasing need and demand and to demonstrate the National Park Service's (NPS's) and HI's core message of stewardship of natural and cultural resources. Improvement and expansion of HI is *needed* because the current campus facilities are inadequately sized and in less than optimal condition to accommodate increasing demand for high-quality environmental education in a national park setting. Action is also needed to ensure the long-term financial sustainability of HI's programs.

The renovated campus proposed in this plan would provide a teaching model of sustainable living and state-of-the-art learning facilities. In addition, it would aid in teaching students to be environmental stewards and allow instructors to incorporate the unique park resources of the Marin Headlands into the learning experience. Campus improvements proposed include additional lab, classroom, dining and dorm spaces; increased teaching spaces connected to the surrounding environment; additional playing areas; improved campus circulation (pedestrian and vehicular) and parking; and increased security and safety. It is anticipated that up to 350 students (a 75% increase from the current capacity of 200 students) could be served under the improvement and expansion plan.

Project Objectives

The objectives of the project include:

1) Preserve and interpret the site's layered natural and cultural resources so students can experience the resources, understand how they have interacted over time, and learn how to sustain them.

2) Renovate campus facilities to be teaching models of sustainable living that interconnect stewardship in the park, at home and throughout life.

3) Improve and expand classrooms and labs to provide students with state-of-the-art learning tools that support HI's curriculum and experiential group teaching method.

4) Maintain the long-term financial stability of HI and further its mission as a park partner by expanding its student body and conference programming, to serve as many people as possible while protecting the Marin Headlands and the park's environmental resources.

5) Improve sleeping accommodations and dining facilities to comfortably and efficiently accommodate students so that they can focus on learning.

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6) Provide an efficient, comfortable, safe and accessible place to learn and work by integrating sustainable design measures as well as Americans with Disabilities Act (ADA) access provisions.

7) Integrate the indoor and outdoor spaces on the campus with the defining resources of the site to immerse students in the place and enable them to experience all aspects of the environment—from flora and fauna to quiet and darkness—with minimum impact on sensitive resources.

8) Minimize environmental impacts to the site, including impacts caused by traffic, circulation, and programming on and off the HI campus.

9) Achieve zero net increase in water and energy use and sewage output while increasing the student body by up to 75%.

10) Create a cohesive and unified campus within a manageable area while continuing to make the best use of the buildings currently occupied by HI.

Alternatives

The No Action alternative and three action alternatives were analyzed for this environmental assessment.

Alternative A: No Action—The No Action alternative consists of continuing existing/ongoing HI management and operations. HI currently occupies eight buildings within Fort Cronkhite and uses the fort's parking areas, circulation routes, and open spaces. The buildings provide administration, education, housing and dining facilities for staff, students, and conference attendees. The same spaces are used for both educational and conferencing purposes. Currently, an average of 200 visitors participating in the Field Science Programs stay overnight at the HI campus. Most of the teaching experience occurs away from the campus in the national park environment. Currently, 22 such off-campus teaching sites are routinely used by HI. HI currently employs 53 staff members.

Elements Common to all Action Alternatives—Activities or elements that would take place under all action alternatives (but would not take place under No Action) include:

- Expansion of the capacity of the programs and facilities to accommodate up to 350 students (a 75% increase from the current capacity of 200); staff would increase from the current 53 to as many as 80.
- Rehabilitation of seven of the eight buildings currently occupied by HI within Fort Cronkhite.
- Building 1054 would be vacated by HI and returned to NPS for management (eliminated from HI campus)
- Building 1059 would be rehabilitated for interpretive and dormitory purposes, and jointly managed with NPS.
- Enhancement of the HI campus landscape—re-establishment of historic roads and perimeters; restoration using native vegetation; creation of new and altered open spaces and activity areas, removal of social trails; replacement of campus signage and lighting.
- Enhancement of the riparian corridor running through and under the HI campus on Fort Cronkhite from Bunker Road to the edge of Rodeo Lagoon.
- Circulation and parking improvements—a new student drop-off loop would be established; parking spaces would be removed/replaced at a 1:1 ratio.

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- Increased management of off-campus teaching sites and addition of new sites as student body grows.
- Incorporation of sustainable systems and design to minimize the use of non-renewable resources and the production of waste.
- All improvements would meet applicable codes and ADA accessibility standards.
- Project implementation would occur over a three- to eight-year period.

All landscape modifications, building rehabilitation, and new construction proposed under action alternatives would be conducted in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and guidance provided in the *Preliminary Report on the Headlands Institute Campus Landscape* (Auwaerter and Curry 2008).

Alternative B: Rehabilitation Only—Alternative B would rehabilitate 13 existing historic buildings within the Fort Cronkhite campus. Implementation of this alternative could result in the relocation of NPS functions currently housed in three Fort Cronkhite buildings (Building 1046–maintenance, Building 1042–short-term housing dorm, and Building 1034–fire dorm). This alternative focuses on creating a unified campus organized around a central open space with views of the defining natural and cultural resources of the Marin Headlands—the lagoon, the ocean, and the batteries.

Alternative C: Rehabilitation and Three New Buildings—Alternative C would rehabilitate 10 historic buildings and construct up to three new buildings within historic building footprints at Fort Cronkhite. Construction would be in a style compatible with the historic World War II buildings. This alternative maximizes the concentration of campus on the east end of Fort Cronkhite and offers multiple opportunities to demonstrate and use state-of-the-art sustainable construction.

Alternative D: Rehabilitation and One New Building—Alternative D would rehabilitate 12 structures and construct one new building within a historic building footprint at Fort Cronkhite. Implementation of this alternative would result in the relocation of park functions currently located in two Fort Cronkhite buildings (maintenance, short-term housing dorm). This alternative combines a newly unified campus organized around a central open space with the opportunities offered by state-of-the-art sustainable new construction.

Preferred Alternative—The preferred alternative for the Program implementation is Alternative D for reasons described below.

- Alternative D presents the most advantages for the evaluation factors of operational efficiency, resource protection, and visitor experience when compared to the other action alternatives. Specifically for operational efficiency, one of the project objectives is to have a cohesive and unified campus.
- Alternative D would provide for the most efficient consolidation of HI's campus functions on or adjacent to the former Nike site and central open space compared to the other alternatives.
- For cultural resource protection, Alternative D would include the rehabilitation of 12 historic buildings, which is more than Alternative C and only one building less than Alternative B. In terms of new construction, only one new building would be constructed at the northeast corner of the campus on the footprint of a historic building. In comparison to Alternative C, which includes construction of three new buildings, this would be less of an impact on the site. The new building would be compatible with the historic setting and would visually reinforce an understanding of the historic complex's spatial organization. It would also be LEED-certified

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and provide opportunities for hands-on learning experiences for students in state-of-the-art, sustainable building practices.

Environmentally Preferable Alternative—The action alternatives are very similar in their overall beneficial and adverse effects on park resources, the majority of which are negligible to minor in intensity. However, construction of new buildings was found as a discriminator that would increase the intensity of impacts. New construction would occur under Alternatives C and D. Taking all impacts together, the differences between the various alternatives are not great, but Alternative B is anticipated to have slightly reduced adverse impacts overall. For this reason, Alternative B was selected as the environmentally preferable alternative.

Impact Topics Analyzed

The following individual impact topics were analyzed in this environmental assessment to determine the potential effects that would occur as a result of implementation of each of the four alternatives:

- Soils
- Water Resources
- Vegetation
- Wildlife
- Species of Special Concern
- Air Quality
- Cultural Resources
- Visitor Experience
- Transportation
- Visual Resources
- Park Operations

No impairment to park resources is expected under the proposed alternatives. Please refer to Table 4 for a summary of impact intensities by alternative. Proposed mitigation measures are described in Table 5.

Environmental Review Process

The EA will be available for a 30-day public review and comment period beginning on the date the legal notice appears in the Marin Independent Journal. Written comments received on the EA will be screened to determine whether any important new issues or reasonable alternatives or mitigation measures have been suggested. If major substantive issues are raised which point to the potential for significant impacts, an Environmental Impact Statement would be prepared, otherwise a Finding of No Significant Impact (FONSI) will be prepared.

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DRAFT

September XX, 2009

United States Department of the Interior, NPS
Attn: Mr. Frank Dean, Acting General Superintendent
Fort Mason
San Francisco, CA 94123

RE: Comments on the Headlands Institute Campus Improvement and Expansion Plan Environmental Assessment.

Dear Mr. Dean:

The City of Sausalito appreciates the opportunity to comment on the Environmental Assessment prepared for the Headlands Institute Campus Improvement and Expansion Plan. While the City is generally supportive of preferred Alternative D and commends the rehabilitation of the existing historic buildings, in addition to the incorporation of sustainable and green building practices into the project, the City of Sausalito is unclear on the direct impacts the project may have on the City with regards to traffic and sewer.

Traffic. A full description and analysis is needed regarding the traffic generated by project Alternatives B, C, and D. In addition, analysis is needed on the direct impacts the increase in traffic will have on the City's roadway infrastructure relating to Alexander Avenue, Second Street, and Bridgeway, as well as any impacts to intersections associated with the aforementioned roadways.

Sewer. The City of Sausalito, the Sausalito-Marin City Sanitary District (SMCSD), and the Tamalpias Community Service District have received Notice of Violations from the Environmental Protection Agency to prevent sanitary over-flow from entering the San Francisco Bay. The City is concerned that the expanded project Alternatives may exacerbate the current capacity at the SMCSD and result in the overflow of wastewater in the Bay. As such, the Environmental Assessment needs to describe the wastewater flows generated by the project alternatives as well as the impact of those flows on the contractual maximum discharge

allocations for both wet and dry seasons based on the maximum carrying capacity of the SMCSD.

Thank you in advance for time and consideration in responding to these concerns.

Sincerely,

Adam Politzer
City Manager

Cc: Sausalito-Marin City Sanitary District

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