

Mr. Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103



August 25, 2011

Re: Planning Department Case #2010.0493E: AC34 Draft EIR

Dear Mr. Wycko:

The Marin Conservation League has monitored projects with impacts on Marin for 77 years. We recently reviewed the DEIR for the Americas Cup 34 for adequacy in addressing issues potential impact to Marin. Issues of specific concern include: water quality, impacts on wildlife and rare plants, and transportation and circulation.

Water Quality

The potential impact of large numbers of boats from other parts of the world importing undesirable organisms in the Bay is tremendous. The EIR states that it should not be a problem if current laws and regulations are followed. The question is whether the agencies responsible have the capacity to monitor the influx of boats. How many people would be needed to inspect and enforce laws and regulations for the anticipated number of boats? Do the agencies have that capacity?

The number and locations of pump-out stations is critical. Are they distributed around the Bay with adequate access? We are pleased the instructions are going to be in a variety of languages to assure operators of visiting boats will understand regulations.

Biological Resources

The Bay Area hosts a variety of wildlife and protected plants, some of which are in the Bay itself. Eel grass beds will be identified in the literature for visiting boats, but, again, enforcement will be critical to keep anchors and anchor chains from ripping out great swaths of the eel grass. The regulations are only as good as the enforcement, especially with people not familiar with the Bay. Who will monitor where boats moor?

The DEIR recognizes the harbor seals and harbor porpoises as common occupants of the Bay, somewhat accustomed to maneuvering around the commercial and recreational water craft. It does not discuss the fact that the AC34 race boats are much faster than the usual weekend racing sailboat. What can be done to help keep these mammals from being run over by the high speed AC34 boats? It is understandable that the boats do not want to hit anything, but the mammals are not always before surfacing.

It is recommended that areas of rare or endangered species on the Marin Headlands be fenced

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off to keep visitors from trampling rare plants or the habitat of butterflies. That may work some of the time, but on important race days enforcement will be needed. Is that the responsibility of the race organizers or the GGNRA Park staff?

Transportation and Circulation

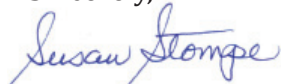
It is apparent from the DEIR that demands on the transportation services to and from Marin County will exceed the capacity of service providers. Supplemental routes were recommended. Would these supplemental routes be paid for by the GGBHTD or the event sponsors or cost covering fares?

The Golden Gate Bridge would be a terrific spot to watch the races. It would require some special regulation and enforcement during race days. Since people would be restricted to the east sidewalk would there be any danger of the weight stress similar to the 50th anniversary celebration? The overlook at the north end of the bridge could be a nightmare unless there is strict enforcement of a precalculated capacity of vehicles and pedestrians.

The road up to the Marin Headlands could also have a capacity challenge. Monitoring and diversion should be enforced on important race days. It would also be important to have contingency plans if crowds exceed the safe capacity.

We appreciate the opportunity to comment on the DEIR. Please advise us when the Final EIR is available to the public.

Sincerely,



Susan Stompe
President