



# THE MAIN PARADE

PRESIDIO OF SAN FRANCISCO  
SAN FRANCISCO, CALIFORNIA



Photosimulation by Olin Partnership

*“As part of the Golden Gate National Recreation Area, the Presidio’s significant natural, historic, scenic, cultural and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources.”*

**FROM THE PRESIDIO TRUST ACT (P.L.104-333)**

# *Contents*

## **ENVIRONMENTAL ASSESSMENT**

1	Need for the Project	1
	Background	1
	Statement of Need	2
	Purpose and Contents of EA	3
2	Description of the Proposed Action and Alternatives	5
	Rehabilitation Alternative (Proposed Action)	5
	Restoration Alternative	15
	No Action Alternative	21
3	Environmental Impact of the Proposed Action and Alternatives	23
	Archaeological Resources	23
	Cultural Resources	28
	Parking	31
	Circulation	33
	Visual Resources	36
	Visitor Experience, Interpretation and Recreation	37
	Hazardous Materials	43
	Geology and Soils	44
	Biological Resources	45
	Water Resources	47
	Air Quality	51
	Noise	52
	Solid Waste	54
	Light and Glare	55
	Consistency with the PTMP and VMP	55
	Cumulative Impacts	58
4	Agencies and Persons Consulted	69
	Advisory Council on Historic Preservation / California State Historic Preservation Officer / National Park Service	69
5	Public Involvement	71
	Public Meetings Prior to Scoping	71
	Scoping Process and Issues Raised during Scoping	72

**FIGURES:**

1	Site Plan of Rehabilitation Alternative	7
2	Aerial View of Rehabilitation Alternative	9
3	Proposed Circulation	11
4	Parking Improvements	13
5	Site Plan of Restoration Alternative	17
6	Aerial View of Restoration Alternative	19
7	Site of El Presidio de San Francisco	25
8	View along Anza Esplanade (Rehabilitation Alternative)	39
9	View along Anza Street (Restoration Alternative)	41

**FINDING OF NO SIGNIFICANT IMPACT**

**ATTACHMENTS:**

1	Mitigation Monitoring and Enforcement Program	A-6
2	Response to Comments	A-10

# *1 Need for the Project*

The overall objective of the project is to rehabilitate the Main Parade, reinforcing the historic Main Post as the heart of the Presidio and as the center of a new community and national park site. The following explains the need for the Main Parade project.

## **BACKGROUND**

### **THE PRESIDIO TRUST AND THE PRESIDIO OF SAN FRANCISCO:**

The Presidio Trust (Trust) is the federal agency charged with protection and management of the 1,168-acre inland portion of the Presidio of San Francisco (Presidio) known as Area B (see back cover). The Trust is rehabilitating and reactivating the former army post's historic buildings and landscapes as a part of the nation's largest and most visited urban national park.

The "Defender of the Gate" from 1776 until 1994, the Presidio was a military garrison for almost 220 years. In 1776, the Spanish founded El Presidio to prevent Russia and Britain from establishing a presence on San Francisco Bay. From 1822 to 1835, the Presidio became the northernmost outpost of an independent Mexico, and in 1846, during the Mexican-American War, the United States occupied the then derelict Presidio. Over time, the U.S. Army fortified, developed and landscaped the Presidio as America's premier military post on the West Coast. The Presidio is a showcase of military architecture dating from the 1860s to the Cold War era, and was designated a National Historic Landmark District (NHLD) in 1962 due to its importance to the history of Spanish Colonization and Exploration of America. The Presidio contains over 800 buildings, of which approximately 470 are historic and contribute to its status as a NHLD. In addition, the Presidio contains significant cultural landscapes, including a 300-acre historic forest, designed landscape areas, and formal open spaces such as the parade grounds. These historic elements are complemented by important natural features, spectacular vistas, and recreational opportunities.

In 1994, the Presidio was transferred from the U.S. Army to the National Park Service (NPS). Following the passage of the Presidio Trust Act (P.L. 104-333) in 1996, Area B came under the jurisdiction of the newly created Trust. The Trust is a federal agency established by Congress and overseen by a presidentially appointed board of directors. The Trust's mission is to preserve and enhance the Presidio as an enduring resource for the American people. To achieve its mission, the Trust generates revenues by leasing the park's buildings. Federal appropriations diminish each year and will cease at the end of fiscal year 2012. The Trust uses these sources of funding to operate the park and undertake necessary capital improvements.

In 2002, the Trust adopted the Presidio Trust Management Plan (PTMP), which lays out a general framework for preserving and protecting the park's cultural, natural, scenic, and recreational resources for serving the public and for financing the park's care.

## THE MAIN POST AND THE MAIN PARADE:

The Main Post district of the Presidio has undergone continuous expansion and redevelopment in its 225-year history, and has been the subject of much study. Varied architectural styles and formal landscapes illustrate the layering of construction over time, creating an apt setting for telling many of the Presidio's stories. Today, 138 buildings (110 historic and 28 non-historic) remain. Roughly 85 percent of these buildings have been or are in the process of being upgraded or rehabilitated to host new park tenants. The remainder still needs to be rehabilitated and reused. Preferred land uses include a mix of offices, cultural/educational uses, and housing, complemented by small-scale lodging and conference space, recreation, and some supporting retail services.

The Main Post includes ceremonial spaces as well as intimate ones. the three parade grounds, the Funston Avenue streetscape, and the Montgomery Street barracks, as well as remnants of the historic entry circle, garden, and pathway (known as the Alameda) at Presidio Boulevard/Funston Avenue. Large, monumental spaces are punctuated by features like the flagpole, the firehouse, the former powder magazine, and the heritage trees (i.e., the Centennial and Bicentennial Trees). These landmarks have symbolic value and add human scale to the landscape, orienting visitors.

The Main Parade is the sloping surface parking lot and adjacent areas bounded by Montgomery, Lincoln, Graham, and Sheridan Streets in the Main Post. The area, in part, overlies the archaeological remains of San Francisco's birth place at the El Presidio, and is adjacent to other principal open spaces including the Old Parade and Pershing Square. "Greening" the Main Parade was identified as an important objective in the PTMP, and would result in one of the most noticeable visual changes likely to occur during the Presidio's transformation from military post to park. Greening has not been explicitly defined, but is presumed to include the introduction of lawn areas and other landscape improvements that are compatible with the historic character of the Main Post district of the Presidio.

## STATEMENT OF NEED

The Main Parade offers a dramatic site framed by historic buildings dating to the 19<sup>th</sup> century and enhanced by spectacular views of San Francisco Bay and the Golden Gate Bridge. Having served the military as a center of activity for many decades, World War II-era changes largely erased the Main Parade's overall historic patterns and character, as buildings were demolished and the project site was paved as a parking lot. In order for the project to be considered successful, it should establish the Main Parade as the Presidio's central gathering place, improve both its appearance and accessibility, and enhance its connection to the park as a whole. Specific project objectives include the following:

## NATIONAL SIGNIFICANCE:

The Presidio is a distinguished national park site and NHL. Accordingly, the Main Parade project should recognize the historic military order in the landscape and include opportunities for interpreting the Presidio's history. The project should incorporate existing landmarks and symbols such as the Centennial and Bicentennial trees, former powder magazine, and flagpole, and should reinforce important historic spatial and visual relationships, including the boundaries of the parade grounds and the relationships between buildings

## MAIN PARADE

and open spaces. New elements should be compatible with the NHL, and changes should seek to avoid or minimize adverse effects to historic resources.

#### CHARACTER AND FUNCTION:

The Main Parade is a vast space at the center of a park and dynamic civilian community. Thus, the Main Parade project should create a vibrant open space by reducing pavement and introducing grass and other compatible materials that complement adjacent structures and express an aesthetic appropriate to a national park site. The project should provide venues for programs of various types and sizes, and increase opportunities for planned and unplanned gatherings. It should include outdoor space for performances and festivals, as well as for small-scale gatherings and daily activities such as picnicking, staging for tours, and other visitor experiences.

#### ACCESS AND PARKING:

The Main Post is envisioned as the central arrival area for visitors and as a lively pedestrian district. Therefore, the Main Parade project should improve circulation, creating distinctions between vehicular and pedestrian routes, and improve connections to the surrounding buildings, the transit center (Building 215), and the Presidio as a whole. The project should anticipate opportunities to enhance physical and visual connections to Crissy Field when Doyle Drive is replaced, and should include sufficient parking at locations appropriate to serve existing and planned land uses.

#### PURPOSE AND CONTENTS OF EA

This environmental assessment (EA) identifies the environmental effects of the proposed Main Parade project within the Main Post district. The Council on Environmental Quality's (CEQ) regulations implementing the National Environmental Policy Act (NEPA) allow federal agencies such as the Trust to prepare an EA to assist agency planning and decision-making (40 CFR 1501.3). An EA provides evidence and analysis to determine whether an EIS is required, aids a federal agency's compliance with the NEPA when an EIS is not necessary, and facilitates preparing an EIS if one is necessary (40 CFR 1508.9(a)).

This EA tiers<sup>1</sup> from the PTMP EIS and analyzes specific project alternatives for the "greening" of the Main Parade, an implementation activity and goal identified in the PTMP. In tiering from the PTMP EIS, the EA incorporates by reference the information and analysis presented in the PTMP EIS and concentrates on site-specific issues related to the current project. PTMP EIS mitigation measures that have been incorporated into the current project are also discussed. The EA is divided into five sections:

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<sup>1</sup> The coverage of general matters in broader EISs, with subsequent narrower tiered statements or environmental analyses, incorporating, by reference, general discussions and concentrating solely on the issues specific to the statement subsequently prepared (40 CFR 1508.28). The CEQ NEPA Regulations encourage the use of tiered documents to "eliminate repetitive discussions of the same issues" (40 CFR 1502.20) and to "focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe" (40 CFR 1508.28(b)). The PTMP EIS can be viewed at the Presidio Trust library, 34 Graham Street, San Francisco, California or on the Trust's website at <http://www.presidio.gov/Trust/Documents/EnvironmentalPlans/>.

- 1 Purpose and need for the project
- 2 Description of the proposed action and alternatives considered, including a no action alternative
- 3 Affected environment and environmental consequences of the proposed action and alternatives
- 4 A synopsis of all agencies, organizations, and persons consulted; and issues raised during consultation
- 5 A summary of the public involvement process, including responses to comments made during scoping

The EA serves as the factual support for the conclusions in the attached finding of no significant impact (FONSI). The EA/FONSI will be made available for public review for a minimum of 30 days before the Trust makes its final determination whether to prepare an EIS or move forward to implement the proposed action.



## 2 *Description of the Proposed Action and Alternatives*

The following briefly describes the proposed action and the alternatives.

The proposed action and its primary alternative have been developed using treatments identified in the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes. The treatments establish an overall historic preservation approach, as well as a philosophical framework from which to operate. The two treatments that were considered for the Main Parade are *Rehabilitation*<sup>2</sup> and *Restoration*.<sup>3</sup> For both treatments, the Main Parade's existing conditions and its ability to convey historic significance were carefully considered.

### **REHABILITATION ALTERNATIVE (PROPOSED ACTION)**

Under the proposed action, the Main Parade would be rehabilitated as the green open space 'heart' of the Main Post, designed to accommodate an array of new public uses, including historical re-enactments, performances, special events, and everyday activities. It would feature the following major design elements: the Main Parade, the Anza Esplanade, Pershing Square, building rehabilitation and limited infill construction, vehicular and pedestrian circulation, relocation of parking, and "green"<sup>4</sup> design. A site plan and aerial view of the proposed action are provided in Figures 1 and 2, respectively.

#### **MAIN PARADE:**

The historic character of the Main Parade would be re-established by narrowing the parade to reinstate its historic eastern edge and replacing its asphalt surface with grass. The parade ground would retain its historic sloped and open character, with four paved transverse paths crossing from east to west to improve pedestrian circulation, and a series of 15 narrow stone bands set into the grass at the upper (southern) end of the parade ground to create seating for outdoor performances and public programs.

#### **ANZA ESPLANADE:**

Anza Street would be converted from automobile use to create the Anza Esplanade, a wide pedestrian promenade lined with landscaped terraces that incorporate an extensive program of historical interpretation, and create a new platform for public programs, small performances, special events, and public art. The Anza Esplanade would organize visitor experience by creating a new pedestrian corridor linking the Presidio Officers' Club (Building 50) and El Presidio site at the south to the Presidio's northern waterfront at Crissy Field. The Anza Esplanade would function as an outdoor classroom, with wayside panels, interpretive installations, and a

<sup>2</sup> Rehabilitation is defined as making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical or cultural values. Rehabilitation standards acknowledge the need to alter or add to a cultural landscape to meet continuing or new uses while retaining a landscape's historic character.

<sup>3</sup> Restoration is defined as accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period.

<sup>4</sup> Low impact and environmentally sensitive design and construction practices that seek to lower energy consumption, conserve natural resources, and reduce pollution.

series of small interpretive pavilions, designed to create weather-protected venues for education programs and changing interpretive exhibits. Although a new feature, the Anza Esplanade is designed to fill the footprint formerly occupied by the historic Graham Street barracks, a series of buildings demolished by the US Army, thereby re-establishing the historic width of the Main Parade. Consistent with the Secretary of the Interior's Standards for Rehabilitation, the Anza Esplanade would use compatible contemporary design, employing forms, materials, colors, and vegetation types that reinforce the historic military order and design character of the Main Post.

#### PERSHING SQUARE:

Landscape and interpretive improvements would be made to the Pershing Square to make way for and incorporate the excavation and commemoration of the western facade of the Spanish-era El Presidio. The excavation and commemoration of El Presidio, the footprint which underlies much of Pershing Square, would require relocating existing landscape features (flagpole, cannon, markers, plantings). A pedestrian extension of the Anza Esplanade to link the Officers' Club and El Presidio site to the Main Parade and new interpretive plaza at the top of Pershing Square, would improve pedestrian circulation and create a vehicle for linking interpretation of these important historic sites.

#### BUILDING REHABILITATION AND INFILL CONSTRUCTION:

Under the proposed action, one new building totaling approximately 3,000 square feet would be built to house a new restaurant/café and visitor services (including public restrooms) along the Anza Esplanade, immediately west of Buildings 86 and 87. Interpretation shelters would also be integrated at appropriate locations in the landscape. Consistent with the Secretary of the Interior's Standards for Rehabilitation, new infill structures would utilize compatible contemporary design, employing forms, materials, and colors that reinforce the historic military order and design character of the Main Post. In addition, the historic powder magazine (Building 95) would be rehabilitated and opened to the public as a gallery space housing changing exhibits interpreting Main Post history.

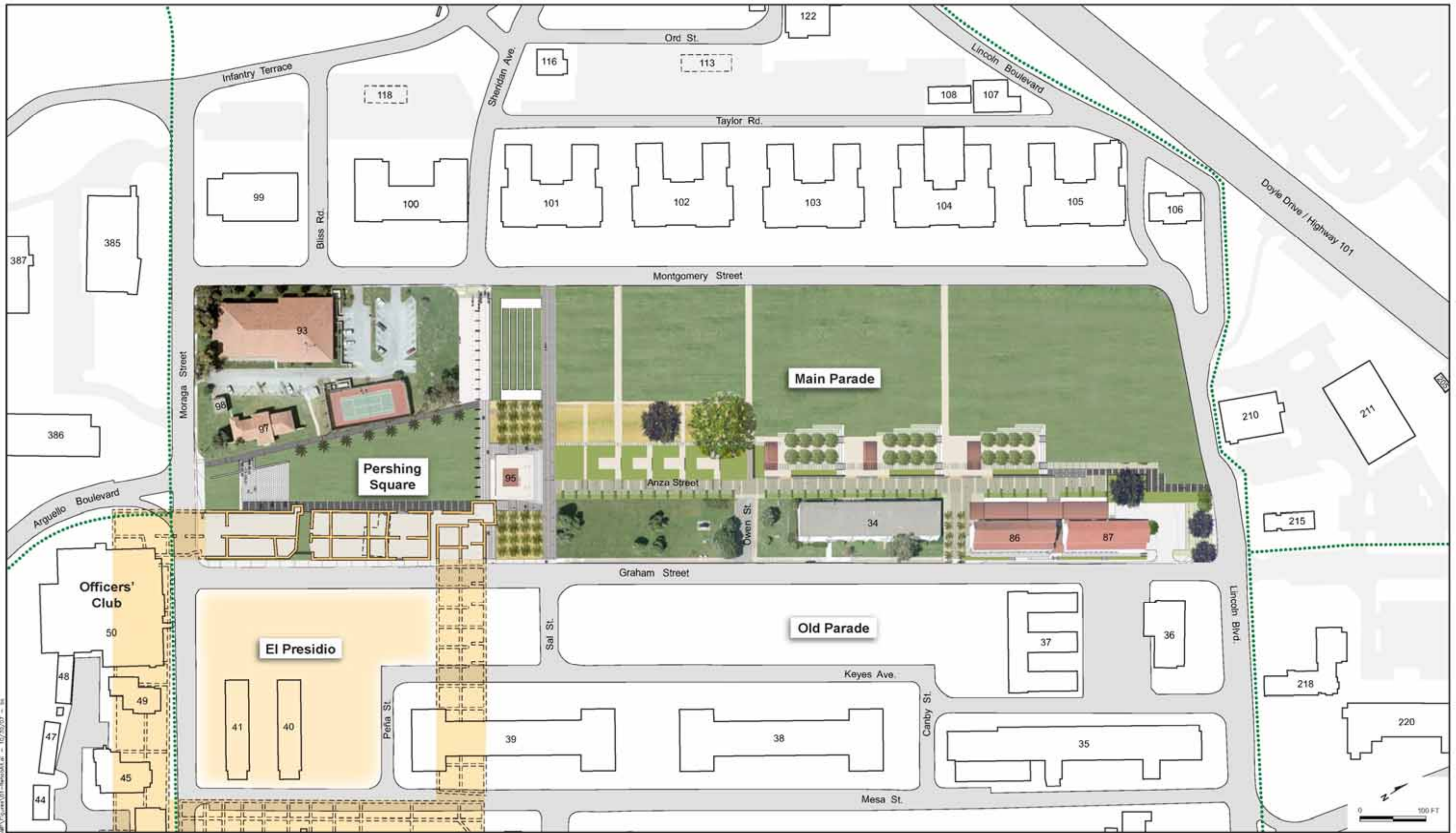
#### VEHICULAR AND PEDESTRIAN CIRCULATION:

The proposed action includes several measures designed to clarify vehicular circulation and improve pedestrian circulation at the Main Post (Figure 3). Anza Street would be converted into the pedestrian Anza Esplanade. Sheridan Avenue between Montgomery Street and Graham Street and Arguello Boulevard between Sheridan Avenue and Moraga Street would be closed to vehicles as well and converted into new pedestrian circulation routes, and would also incorporate materials interpreting the history of the Main Post and the Presidio.

#### PARKING:

Under the proposed action, the large, central parking lot would be replaced with smaller, decentralized parking lots to better serve the whole Main Post (Figure 4). Existing street parking would be preserved and new street parking would be added. The number of district parking spaces would remain approximately the same as it is

#### MAIN PARADE



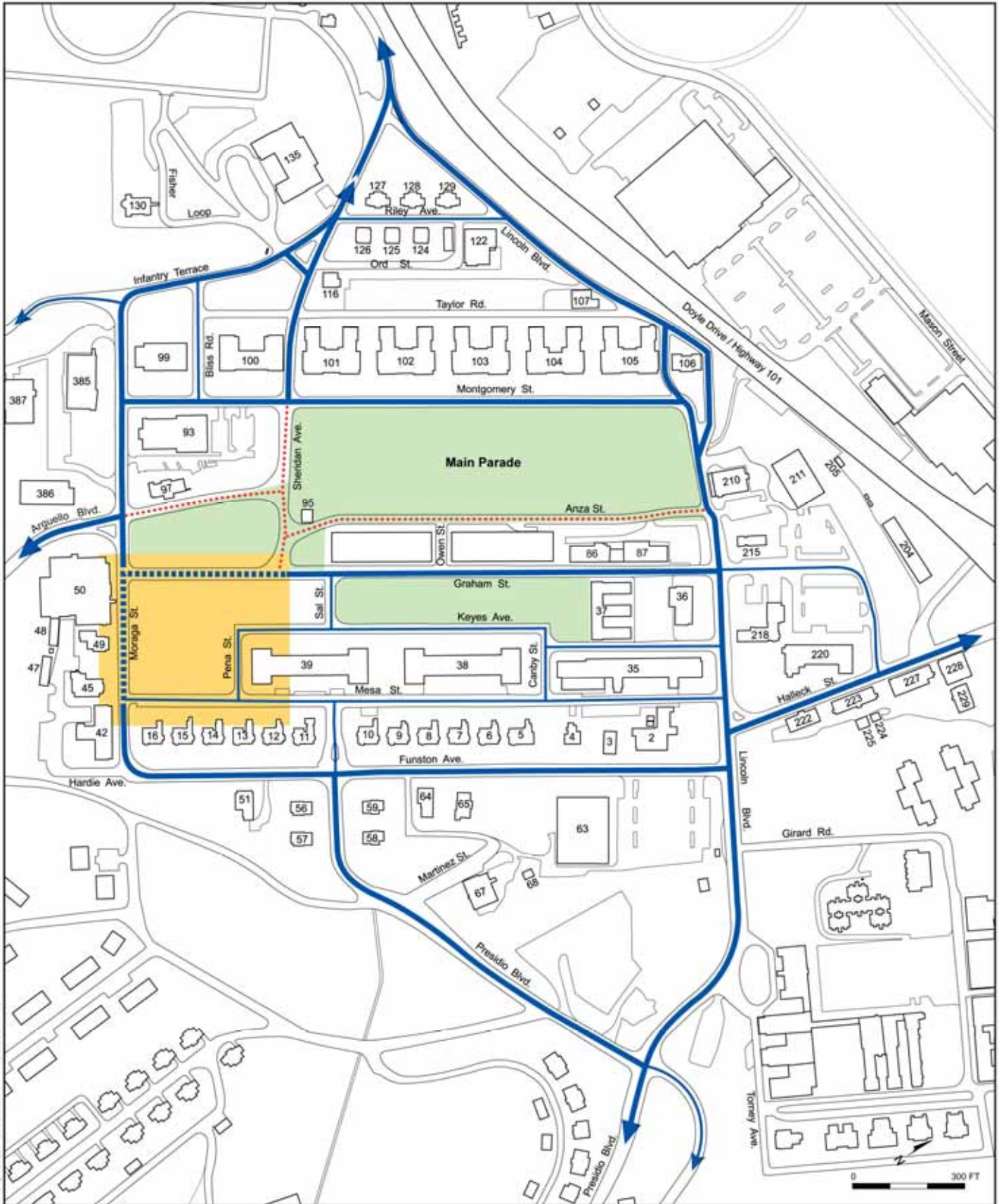
**Figure 1**  
**Site Plan of Rehabilitation Alternative**





**Figure 2**  
**Aerial View of Rehabilitation Alternative**

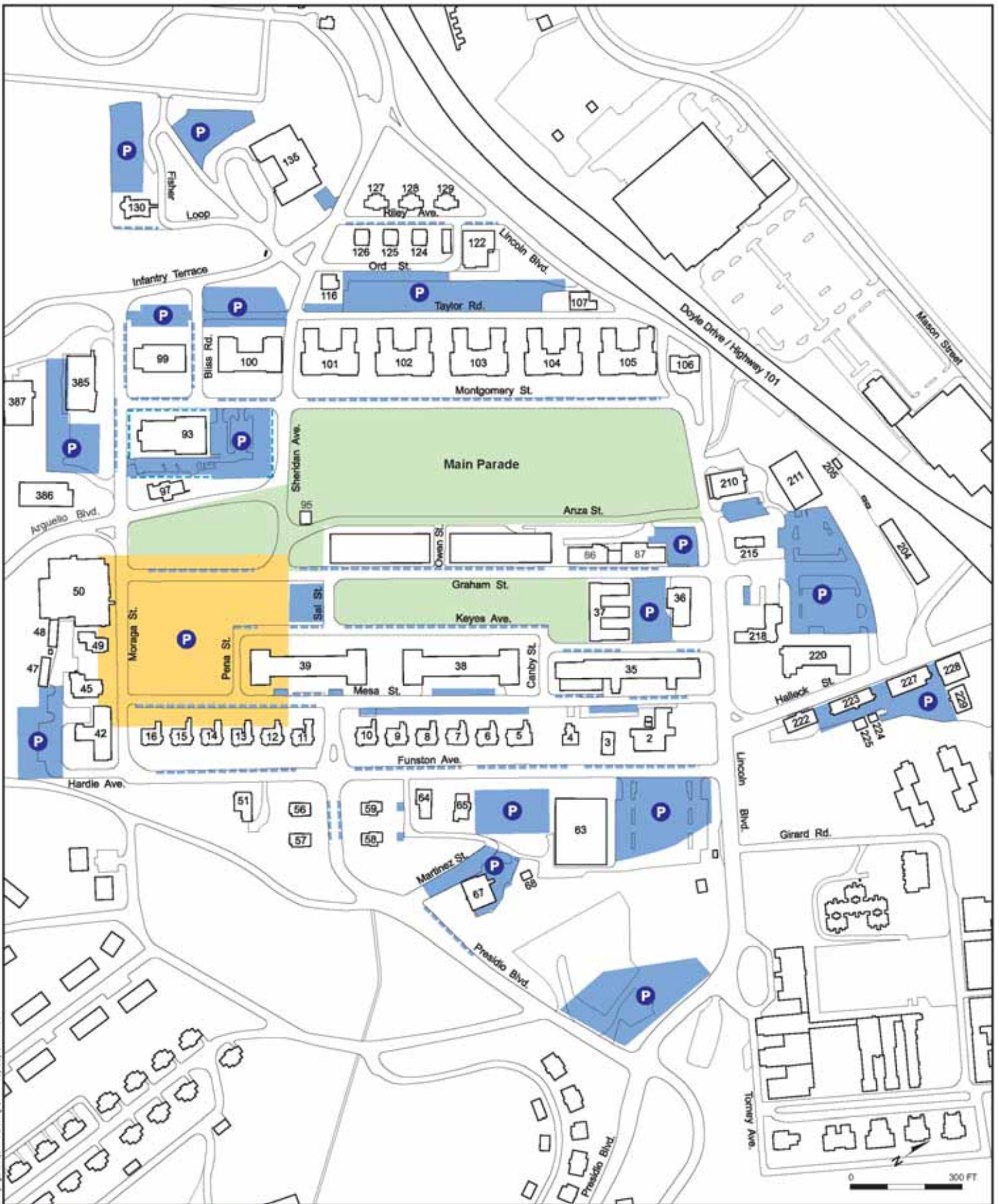




- Major Streets
- Secondary Streets
- - - - Major Streets within El Presidio Footprint
- - - - Roads Converted to Pedestrian Use
- El Presidio Archaeological Area
- Lawn - No Traffic

Source: Presidio Trust, June 2007

**Figure 3**  
**Proposed Circulation**



- Parking
- El Presidio Archaeological Area - Some Parking
- P Parking Lots
- Lawn - No Parking
- On-Street Parking

Source: Presidio Trust, June 2007

**Figure 4**  
**Parking Improvements**

November 2007  
Main Post Environmental Assessment



today. Parking for an estimated 2,150 cars would be maintained in the new lots (excluding Infantry Terrace) to adequately accommodate expected demand. With few exceptions, tenants would share available parking and would not receive “assigned” parking spaces. Each tenant’s parking would be located within a reasonable walking distance (typically 1500 feet or a five-minute walk). The Trust would ensure that sufficient parking is provided for tenants and visitors, but would regulate the parking supply with fees and time restrictions.

The parking lots would be carefully situated, sensitive to natural and cultural resources, and incorporate sustainable principles for parking lot design, i.e., appropriate plantings and surfaces would be used to reduce the potential for erosion and other environmental impacts. Detailed plans and designs would be prepared, and site-specific environmental analyses would be conducted as required.

#### GREEN DESIGN:

A Stormwater Control Plan would be developed during the permit review process to minimize site imperviousness, control pollutant sources, and incorporate treatment and flow-control facilities that retain, detain, or treat runoff.<sup>5</sup> Existing pavement would be recycled and reused as an aggregate source on-site to conserve diminishing resources and avoid landfill disposal. All landscaping would be water efficient and “purple piped” to allow for use of recycled wastewater when available. Site lighting would be used only to maintain safe light levels and would employ latest technologies to minimize night sky pollution.

#### RESTORATION ALTERNATIVE

Under this alternative, the now missing historic character of the Main Parade would be returned and an inviting, revitalized open space would be created within the heart of the Main Post. Less ambitious than the proposed action, the alternative would introduce only minimal new elements primarily for pedestrian safety and interpretation. However, under this alternative, the restored Main Parade would still accommodate an array of new public uses, including historical re-enactments, performances, special events, and everyday activities. A site plan and aerial view of the alternative are provided in Figures 5 and 6, respectively.

#### MAIN PARADE:

The Main Parade would be restored as a green open space. The historic character of the Main Parade would be re-established by narrowing the parade ground to bring back its historic eastern edge and replacing its asphalt surface with grass. The parade ground would not be restored to its historic surface of hard packed earth and relatively uneven grass, as this would preclude many types of public use and present ongoing maintenance challenges. The parade ground would retain its historic sloped open character, without pedestrian circulation paths, or other improvements to accommodate special events or public programs. Removal of asphalt and the introduction of green ground cover plant materials would increase the water absorptive potential of the site and therefore reduce storm flows into the Bay or Crissy Marsh.

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<sup>5</sup> The Stormwater Control Plan would meet the criteria in the most recent version of the C.3 Stormwater Handbook as referenced by the Bay Area Stormwater Management Agencies and Associations (BASMAA). The C.3 Stormwater Handbook can be viewed at [http://www.cccleanwater.org/construction/Publications/Guidebook/CCCWP\\_Guidebook\\_3rdEd\\_10-18-06.pdf](http://www.cccleanwater.org/construction/Publications/Guidebook/CCCWP_Guidebook_3rdEd_10-18-06.pdf).

#### ANZA STREET:

Under this alternative, historic Anza Street would remain open to vehicles. The footprint of each of the historic Graham Street barracks, which formerly bounded the east edge of the Main Parade, would be outlined with stone walls infilled with decomposed granite, similar to the treatment envisioned for the former El Presidio site in the proposed action. The historic pedestrian circulation network of walkways and paths connecting the former structures would be rebuilt to provide for pedestrian circulation to and between the footprints of the former structures. A new sidewalk along the west side of Anza Street, when used in conjunction with existing sidewalks, would provide a continuous pedestrian connection between the Presidio Officers' Club and El Presidio site at the south to the transit center on the north. Lined with wayside panels, the new sidewalk and outlined barracks footprints would serve as a staging ground for docent-lead interpretive walks as well as allow for self-guided tours of the Main Post and the Presidio.

#### PERSHING SQUARE:

This alternative would retain Pershing Square's mid-20th century appearance without modification or change. Pershing Square would continue to serve as a platform for educational programs with the spectacular views of San Francisco Bay and the Main Post. The programs could educate and inspire visitors to a better understanding of the Presidio in the history and ecology of the Bay Area.

#### BUILDING PRESERVATION:

Beyond new stone walls to outline previous building locations, this alternative would not include construction of new visitor amenities. However, the former powder magazine (Building 95) would continue to receive preservation treatment and would be available for viewing on guided interpretive tours.

#### VEHICULAR AND PEDESTRIAN CIRCULATION:

Under this alternative, existing streets would continue to provide vehicular circulation. Pedestrian movement in the Main Post would be along existing sidewalks at Graham Street, Moraga Avenue, Sheridan Avenue, and Lincoln Boulevard. A new sidewalk would be introduced along the west side of Anza Street.

#### PARKING:

Similar to the proposed action, this alternative would relocate parking from the large surface parking lot to smaller surface lots and additional street parking throughout the Main Post. Within the Main Post district (excluding Infantry Terrace), there would be a total of approximately 2,050 parking spaces. Main Post tenants' parking demand would peak at different times, so tenants would share parking spaces to efficiently use the available parking supply. Parking spaces would be located throughout the Main Post to provide adequate parking within a reasonable walking distance (typically 1,500 feet or a five-minute walk) of any given tenant. The Trust would ensure that sufficient parking is provided for tenants and visitors, but would regulate parking with parking fees and/or time restrictions to discourage excessive parking.

#### MAIN PARADE





**Figure 5**  
**Site Plan of Restoration Alternative**



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Source: Presidio Trust, June 2007



**Figure 6**  
**Aerial View of Restoration Alternative**

**GREEN DESIGN:**

Sustainable design technologies and strategies would be similar to the proposed action.

**NO ACTION ALTERNATIVE**

Under this alternative, the Main Parade project would not be implemented now or in the future. None of the site modifications and enhancements described above would be constructed. The Main Parade would remain as a surface parking lot, and actions would be limited to continued maintenance and management of the existing facility.

### 3 *Environmental Impact of the Proposed Action and Alternatives*

The following describes the environmental impacts of the proposed action and each alternative.

#### ARCHAEOLOGICAL RESOURCES

##### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The potential impacts of “restoration” of the Main Parade, including new construction within the Main Post district on both prehistoric and historic archaeological sites,<sup>6</sup> are analyzed on pages 215 through 217 of the PTMP EIS. As a result of two centuries of military development and early relic collecting, there are few, if any, surface indications of prehistoric sites. Three sites have been recorded at the Presidio, all within the Crissy Field district, the potential for discovering additional prehistoric archaeological resources at the Presidio is high because of the extensive freshwater resources and the large estuarine lagoons and sloughs that once extended along the waterfront areas. In addition to the known sites along Crissy Field, the PTMP EIS identifies the Main Post as one of several areas as archaeologically sensitive for the discovery of prehistoric sites.

The years of military occupation also resulted in the layering of significant known historic archaeological resources making the potential for additional site discoveries high. At the Main Post, the historic properties represent a variety of types and include: the site of El Presidio de San Francisco (the single most important archaeological site in the park, see Figure 7); a Spanish/Mexican cemetery; staff, laundress and enlisted quarters; a quartermaster complex; a sutler<sup>7</sup> residence and sutlery; and four other properties. Archaeological monitoring and preconstruction inspections are being completed by the Trust for most actions involving ground disturbance to allow archaeologists to make informed decisions about the likelihood of the presence of archaeological resources in a particular area prior to the approval of such activities.

The PTMP EIS analysis concludes that parade ground improvements would be constructed in such a manner as to avoid impacts to the El Presidio site, but that new construction, infrastructure upgrades, pavement removal, and terracing/grading could adversely affect unknown archaeological sites. Conformance with guidelines in the PTMP, measures contained in the PA, and recommendations within the Archaeological Management Strategy (AMS) for the El Presidio site<sup>8</sup> would protect sensitive archaeological areas (Mitigation Measure CR-12 *Archaeological Management Plan for El Presidio*). As the AMS is primarily a program and preservation-oriented document, the Trust will be developing one overarching research design for the Main Post district followed by site-specific testing and/or data recovery plans to locate and record significant features

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<sup>6</sup> The PTMP EIS defines prehistoric sites as the physical evidences of Native American occupations prior to European colonial contact. These native peoples and their descendants were the first inhabitants of the Presidio. Today, some of the descendants are known as the Ohlone. Historic sites are the physical evidence, usually augmented by written documentation, of the Spanish, Mexican, and American occupations which began in 1776, and could also include evidence of the Ohlone and other native peoples who occupied the Presidio in the 18<sup>th</sup> and 19<sup>th</sup> centuries.

<sup>7</sup> A purveyor of victuals or supplies to an army.

<sup>8</sup> A draft copy of the El Presidio Archaeological Management Strategy (“Levantar”) is on file and available for public review in the Presidio Trust library.

or sites in an effort to avoid adverse affects to these resources and incorporate significant properties in the overall design. These measures would provide higher level of protection required for El Presidio and the early U.S. Army sites and features located on the Main Post that contribute to the landmark or are eligible for the National Register.

#### SITE-SPECIFIC ANALYSIS OF MAIN PARADE ALTERNATIVES:

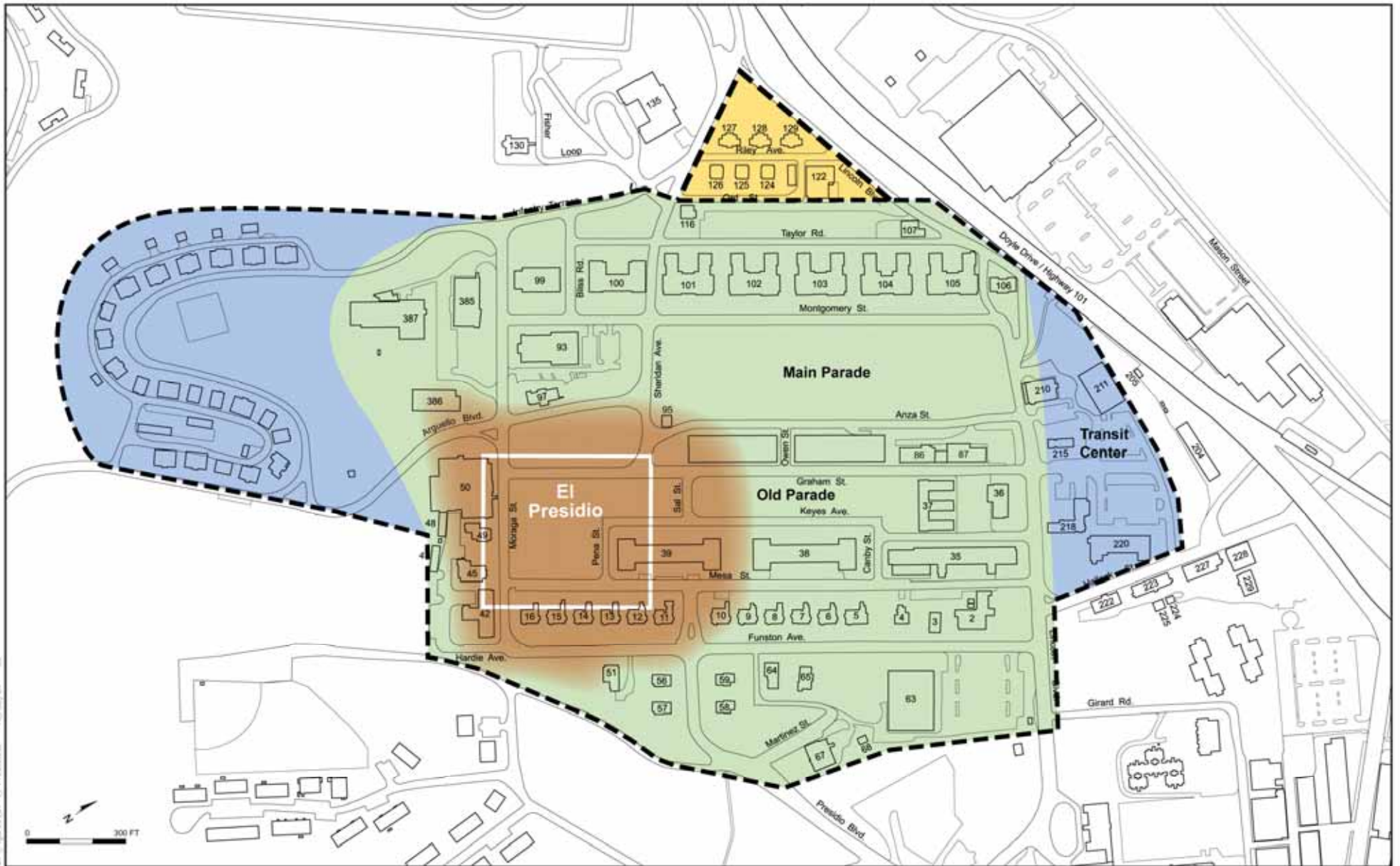
**REHABILITATION ALTERNATIVE** *The proposed action would not affect any known or previously identified archaeological properties in an unanticipated manner.* Since the release of the PTMP, further research and analysis of existing historical documents as well as limited archaeological testing has been completed. Maps and other descriptive documents have been generated from this research that better define changes that have occurred over time in the Main Post landscape. In addition, the AMS for the El Presidio site has been drafted and includes treatment and interpretation recommendations for this important resource. These new sources of information would be used in combination to inform construction and improvements described in the proposed action. The analysis and protection measures put forth in the PTMP remain valid and would also apply for the site.

Further research and testing has confirmed that construction of the Main Parade and associated barracks involved an extensive cut and fill project. A ravine and water drainage ran through the heart of the Main Parade ground similar to Tennessee Hollow. Some of the northern Montgomery Street barracks and possibly all of the Civil War era barracks would have been constructed on native soil. The depth of the original ravine below the current parade ground surface varies from south to north and east to west. Testing also provided better location data on several of the predicted sites mentioned above. However, infrastructure upgrades, pavement removal, and terracing/grading could still adversely affect unknown historic archaeological sites that have been previously protected by the pavement. It is less likely that these actions would disturb prehistoric sites over the fill portions of the Main Parade but could adversely affect these sites in areas where fill is shallow or non-existent. Therefore, the Trust will be developing one research design for the Main Post district followed by site-specific testing and/or data recovery plans to locate and record significant features or sites in an effort to avoid adverse affects to these resources and incorporate significant properties in the overall design.

Improvements proposed between Sheridan Avenue and Moraga Avenue to construct the Anza Esplanade would implement some treatment recommendations from the El Presidio AMS. In this strategy, archaeological excavations would expose the architectural features of El Presidio [circa 1815] in order to represent portions of this site in the modern landscape. Excavation of the western façade of El Presidio, which coincides with Pershing Square, would be prioritized to incorporate this portion of the site into the Anza Esplanade design. Once exposed, these features would be preserved in place. For instance, a protective cap of similar stone could be installed over the foundation walls, which would allow these elements to be experienced and interpreted in the landscape while providing for their protection.<sup>9</sup> Construction of these elements in conformance with the AMS would avoid impacts to the El Presidio site.

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<sup>9</sup> This is the design approach undertaken for the 1780 Chapel site.



- Parking
- Visual
- Additional "visual" area added to APE based on 4/19/2005 consultation meeting
- Estimated boundaries of the archaeological area with known deposits and features from El Presidio
- Project APE

Source: Presidio Trust, October 2007

**Figure 7**  
**Site of El Presidio de San Francisco**

November 2007  
 Main Post Environmental Assessment



Remains of the quarters, where in 1915 the wife and three daughters of Brigadier General John J. Pershing were killed in a fire, may exist below Pershing Square. In addition to this potential, there also is the potential to find remains of several other 19<sup>th</sup> Century U.S. Army structures that once stood atop this western façade of El Presidio. Preparation of a research design and test excavations in advance of construction for the Anza Esplanade would be required to determine the extent and integrity of such features. If subsurface features with integrity are found, these elements could be preserved and represented in the design depending on their legibility in the landscape, or these remains would be excavated in conformance with the approved research design and data recovery plan.

The relocation of parking from the Main Parade to smaller decentralized lots would not preclude the subsequent relocation of parking away from El Presidio as envisioned in the AMS. The relocation of parking away from El Presidio would be beneficial to the long-term management, research, and public interpretation goals for the site. These goals would be furthered through the excavations for and implementation of the Anza Esplanade design. However, proposed traffic circulation would be counter to the priority outlined in the AMS to "close one block of Graham Street to through traffic." The closure of redundant roads at the perimeter of El Presidio would preclude the permanent closure of roads within El Presidio, and therefore would continue to diminish the character of this historic property. Roadways and traffic through El Presidio would limit opportunities to interpret the colonial period and represent it in the landscape. Furthermore, it would preclude ongoing research at this façade of the earlier [circa 1792] portions of El Presidio, which coincides with the alignment of Graham. The Trust would close Graham Street for periods of time, including seasonally, to facilitate excavations, commemorations, and interpretation that would otherwise be prevented by through traffic.

**RESTORATION ALTERNATIVE** Under this alternative, the majority of the proposed improvements would either occur over areas that have been determined to be fill material or are of such a nature that ground disturbance is expected to be minimal. Streets, sidewalks, and Pershing Square would remain as they are and pavement removal would be confined to the Main Parade. It is unlikely that pavement removal, establishment of a vegetated surface, construction of limited new sidewalks, laying of stone outline walls and decomposed granite at former barrack sites, as well as minimal infrastructure upgrades could adversely effect unknown archaeological sites. However, for those activities with potential to effect archaeological properties, the Trust will be developing one research design for the Main Post district followed by site-specific testing and/or data recovery plans to locate and record significant features or sites in an effort to avoid adverse affects to these resources and incorporate significant properties in the overall design. If subsurface features with integrity are found, these elements could be preserved and represented in the design depending on their legibility in the landscape, or these remains would be excavated in conformance with the approved research design and data recovery plan.

Excavation and representation of portions of the architectural features of El Presidio would continue under this alternative, as called for in the AMS, but without added priority for the western façade within Pershing Square. The relocation of parking from the Main Parade to smaller decentralized lots would not preclude the subsequent relocation of parking away from El Presidio as envisioned in the AMS. The relocation of parking away from El Presidio would be beneficial to the long-term management, research, and public interpretation

goals for the site. Traffic circulation would permit the priority outlined in the AMS to “close one block of Graham Street to through traffic” and redirect that traffic to redundant roads at the perimeter of El Presidio to enhance the character of this historic property and allow ongoing research at this façade of the earlier [circa 1792] portions of El Presidio.

**NO ACTION ALTERNATIVE** Under this alternative, grounds maintenance would have minimal or low potential for affecting archaeological resources. No known or previously identified archaeological property is likely to be affected. Excavation and representation of portions of the architectural features of El Presidio would continue under this alternative, as called for in the AMS, but without added priority for the western façade within Pershing Square. Parking within El Presidio could be relocated and through traffic could be redirected from upper Graham Street as envisioned in the AMS.

## CULTURAL RESOURCES

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The potential impacts of landscape improvements and new construction within the Presidio on historic resources, including the NHLD are assessed on pages 199 through 202 of the PTMP EIS. The analysis presents a discussion of proposed changes within the Main Post including landscape changes. The analysis assumes that the Main Parade as a historically significant open space would be retained and enhanced, as would its designed landscape features, streetscapes, and cultural landscapes. It also anticipates:

- Commemorating and/or delineating the location of significant historic elements of the Main Post
- Reinforcing once physically or visually connected historic linkages, such as those from the Main Parade to Crissy Field
- Retaining and enhancing views from the Main Parade to the bay
- Maintaining small structures and symbolic objects, such as the heritage trees, cannons and flagpole that evoke a sense of the Main Post’s history

The analysis concludes that the overall effect of Main Parade improvements on historic resources would be beneficial. Site improvements, such as removal of excess pavement, introduction of wayside exhibits, signs, site furniture, trails, paths, and lighting, would be compatibly designed to ensure no adverse effect on the NHLD.

The Trust would use criteria and processes outlined in the PA in determining effects and pursuing consultation with the National Park Service (NPS), the Advisory Council on Historic Preservation (ACHP), the California State Historic Preservation Officer (SHPO) and other parties, as necessary, for actions that could adversely effect historic resources.<sup>10</sup> Through the application of Planning Principles (pages 2 through 30 of the PTMP), Planning Guidelines for the Main Post District (pages 65 through 69 of the PTMP) and Section 106 consultation as described in the PA (including consultation regarding site-specific design guidelines), the Trust would ensure

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<sup>10</sup>An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association (36 CFR 800.5(a)).



that significant changes to the Presidio's historic landscape would be conducted in a manner that assures the integrity of the NHL (Mitigation Measure CR-4 *Future Planning*). In addition, historic landscape rehabilitation would conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes (Mitigation Measure CR-7 *Compliance with Standards for Cultural Landscape Rehabilitation*). The Trust would further ensure that changes to the historic landscape would conform to the treatment recommendations of the 2002 Cultural Landscape Assessment (CLA) for the Main Post, and the guidance on landscape rehabilitation and site improvements in the draft Main Post Planning & Design Guidelines (February 2007). These latter two documents were tiered from the PTMP to provide expanded guidance for all actions proposed in the Main Post area.

#### SITE-SPECIFIC ANALYSIS OF MAIN PARADE ALTERNATIVES:

Many cultural landscape features of the Main Post contribute to the significance of the NHL. No other area of the Presidio better illustrates the physical evolution of this place, illuminating prominent historical movements, events, and people. The Main Post's spectacular array of surviving elements from each period provides a remarkable record of the Presidio's place in the history of the military and the development of the American West. These elements of the Main Post, together with the area's character-defining features, are identified in a 1993 updated National Register of Historic Places registration form and a 2002 cultural landscape assessment of the Main Post. The evolution of the Main Post chronicled within the 2002 CLA encompasses ten historic periods. The CLA analyzed the past and present physical form of the area, describing seven organizing principles or spatial patterns that should be perpetuated. Developed over several years with input from the public, NPS, and others, the CLA also identified four general objectives for the future, as well as a series of chronologically-organized "treatment notes" and geographically organized "planning recommendations."

The CLA placed development of the Main Parade within the "Grand Post" period from 1891 to 1908, when a creek was filled to create a drill field linking the (then) new Montgomery Street barracks to the rest of the Main Post. The original intent, proposed by Major Hart on a concept of Daniel Burnham, was to create a parade ground from the Montgomery barracks to Funston Avenue, where a similar row of barracks was planned but never constructed. The row of barracks from the Civil War era that lined Graham Street was partially removed in anticipation of this "Grand Parade." The area was used for military drills and artillery practice until the 1930s, but was not heavily used for military parade and pageantry. Front yards adjacent to the Montgomery Street barracks were used for daily troop activity. In the World War II era, the Main Parade was paved as a parking lot.

Pershing Square is not listed as a contributing resource in the 1993 NHL Update. The two Spanish bronze cannons (presumed to have been armament of the Castillo de San Joaquin) which rest near the flag pole are, however, listed as contributing objects while the concrete cannon mounts and other landscape features are identified as non-contributing elements. The Rodman cannon moved (after 1958 but before 1969) from Fort Point to the south concrete deck are also listed as contributing objects in the NHL update. There is no discussion of Pershing Square in either the NHL Update or the 1997 Historic Resource Study for the Presidio other than as a reference location or as the place where the 1994 transfer ceremony from Army to NPS occurred. The only discussion of the history of this landscape area appears in the CLA which states that after

the 1915 house fire in which General Pershing's family died, "Pershing Square, the open space at the south end of Main Post, left after the fire was formally named to commemorate the tragic event." Aerial photographs from the 1920's reveal Pershing Square as a "park like" area bordered by Graham, Moraga, Arguello, and Sheridan. By 1928, the only structures remaining at Pershing Square, a gazebo or bandstand in the southeast corner and a two story wood frame building in the northwest corner, had been removed. The post flagpole was relocated in the early 1950's from the corner of Sheridan and Graham to its current location in the center of Pershing Square. A narrow rectangular concrete pad surrounded the flagpole with the Spanish cannon flanking each side. A concrete walk bisected the square connecting the flagpole to Graham on one side and Arguello on the other. The concrete viewing deck around the flagpole was replaced and the other concrete walkways and decks were added to the site after 1958 but appear in a 1969 aerial photograph. Multiple modifications were made to the walkways and decks on Pershing Square over several years after 1969. The current viewing deck around the flagpole is a compilation of multiple enlargements, accessibility modifications, and drainage enhancement projects. Pershing Square served as a gathering and ceremonial area over the years including such important events as the 1994 transfer of the Presidio. The flagpole continued to function, as it had for many years before, as the symbolic head of the Presidio with the daily raising and lowering of the flag with associated playing of reveille in the morning and taps and cannon fire at sunset.

**REHABILITATION ALTERNATIVE** *The proposed action would have no adverse effect under the NHPA and, in fact, would have a beneficial effect on the cultural landscape of the Main Post.* Missing or altered historic character defining features would be reestablished by removing about 8.5 acres of asphalt pavement (net following construction) and recreating the eastern edge of the Main Parade. Included in the total asphalt pavement removal would be the conversion, within the boundaries of the Main Parade, of both Arguello Boulevard and Sheridan Avenue into pedestrian circulation to simplify the road network in conformance with the Main Post circulation guidelines in the PTMP. The overall effect of these actions would be to enhance the historic integrity of the Main Post. Restoring the landscape along Montgomery Street and maintaining small structures (such as the powder magazine) and symbolic objects (such as the heritage trees) would reestablish historic settings and linkages that have been lost through time because of modern use.

The Anza Esplanade would serve as the interpretive backbone of the Main Post. The Anza Esplanade would recreate the eastern edge of the Main Parade and provide the means of helping visitors both better understand the developmental history of the area and establish linkages to other interpretation opportunities throughout the Presidio such as the NPS Visitor Center in Building 102. The new limited construction associated with the Anza Esplanade would be appropriate and compatible with the Main Post's historic character. The placement of new construction, new trees, and other site elements would protect and maintain historic views. Retention of Graham and Moraga as active streets as well as retention of the alignment of Arguello and Sheridan as major pedestrian walkways would ensure that the boundaries of the park that is Pershing Square would remain intact. Non-historic concrete walks and viewing deck on top of Pershing Square would be removed to reroute pedestrian circulation and to expose El Presidio foundations between Sheridan and Moraga Avenues. The flagpole that was moved to this area in the 1950's would be relocated to the head of the Anza Esplanade at Moraga Avenue to be both closer to the Officers' Club and to continue serving as the symbolic head of the Main Post area. The historic cannon would be relocated to flank the Powder Magazine. Moving the cannon

would not be an adverse effect since the contributing status to the NHL of these objects is not dependent on location but rather through their significance and association as having been armament of the Castillo de San Joaquin for the Spanish cannon and of Fort Point for the Rodman cannon. Although not currently listed as contributing to the NHL, the actions proposed at Pershing Square would not diminish the integrity of “the open space at the south end of Main Post.” Rather these actions would retain its character and purpose as a gathering and ceremonial area such that in the NHL Update scheduled for 2008 it is likely that Pershing Square will be reevaluated and listed as a contributing landscape feature to the NHL.

**RESTORATION ALTERNATIVE** Under this alternative, which would also have no adverse effect under the NHPA, the missing or deteriorated historic character of the Main Parade would be returned through changing the surface back to a more natural material and recreating the eastern edge. The present 6.2-acre asphalt parking lot that occupies the Main Parade would be removed and replaced with lawn. The eastern edge of the Main Parade would be recreated in its approximate original location through use of returned missing elements such as building footprints, plantings and other landscape elements. The historic boundaries of the Main Parade would be restored by re-establishing the historic width and narrowing the parade ground, as it was historically, along the confines of the intruding barrack buildings along the eastern edge. Maintaining small structures (such as the powder magazine) and symbolic objects (such as the heritage trees) would reestablish historic settings and linkages that have been lost through time because of modern use. Installation of a new walkway along Anza Street would provide for pedestrian safety and possible interpretation but would not be an adverse effect in the historic landscape. There would be no change from the current configuration at Pershing Square.

**NO ACTION ALTERNATIVE** Under this alternative, which would have no effect under the NHPA, the existing pavement would remain over the historic Main Parade, and the historic setting of the Main Post would continue to be diminished. The historic eastern edge would not be reestablished and the historic powder magazine and the heritage trees along this edge would continue to be perceived out of context with the history of Main Post development.

## **PARKING**

### **SUMMARY OF PTMP EIS IMPACT ANALYSIS:**

Assumptions for parking management considered in the PTMP EIS analysis and in planning for the Main Parade improvements are provided on page 51 of the PTMP. These include developing policies for managing parking supplies and reducing the demand for parking. These policies will be coordinated with other transportation programs to create a coherent, effective approach to discouraging automobile use and promoting more sustainable means of travel and commuting. Tools may include charging employees for parking during the workday, designated tenant and residential parking areas, designated carpool and vanpool parking, time restrictions, and special events coordination. Future planning efforts will decrease the number of parking spaces in the park but would not impede the Trust’s ability to attract tenants to reuse historic buildings. In the Main Post, the number of parking spaces would remain about the same as it is today. Parking facilities would be concentrated near main activity areas, and would be designed to accommodate the average demand

rather than peak demand during the peak period (e.g. midday weekday, evening or weekend day). Parking areas may be redesigned or relocated to simplify access or to reduce their visual impacts. Some large parking areas may be removed, and smaller peripheral parking lots may be built. Parking would be sufficient to meet tenants' needs and avoid exacerbating parking problems in adjacent neighborhoods.

Information on current parking supply and utilization of parking facilities within the Main Post is provided on page 182 of the PTMP EIS. The PTMP EIS indicates that there are approximately 2,270 parking spaces within the Main Post, with about 29 percent of the spaces occupied during midday. The utilization of all Main Post parking was surveyed more recently in the summer of 2006. Approximately 840 (37 percent) of the spaces were occupied midday on a weekday, an approximate 32 percent increase over year 2000 surveyed conditions described in the PTMP EIS.

An analysis of parking demand and supply for the Main Post under the PTMP is provided on pages 314 through 315 of the PTMP EIS. The PTMP commits to reduce the overall number of parking spaces at the Presidio, but to provide sufficient parking in each district of the Presidio to meet that district's average peak period parking demand. At the Main Post, this future parking demand is estimated to be about 2,015 parking spaces. Approximately 2,115 spaces are proposed to accommodate this demand, which represents a district reduction of about 150 spaces, or 6.8 percent. The parking demand estimates and supply account for shared use of parking, parking management (including fees), and management of resources to accommodate special events.

As required by Mitigation Measure TR-22 *TDM Program Monitoring*, the Trust has implemented a Transportation Demand Management (TDM) Program within the district to reduce automobile usage by all tenants, occupants and visitors. The Trust monitors the effectiveness of the TDM program on an ongoing basis. If TDM goals are not being reached, the Trust implements more aggressive strategies or intensify components of the existing program, such as requiring tenant participation in more TDM program elements, and/or providing more frequent and/or extensive shuttle service.

Mitigation Measure TR-24 *Special Event Parking Management* would ensure that events would be coordinated so that combined parking demand would not exceed parking supply.

#### SITE-SPECIFIC ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not result in a parking deficit.* This alternative would remove the large surface parking lot and locate smaller surface lots near the buildings they serve. Existing street parking would be preserved. Sufficient parking would be provided in the Main Post to serve current and future tenants, including office users, residents, and park visitors. The proposed action would reorganize the existing supply of 2,150 parking spaces (excluding Infantry Terrace) to ensure that there is adequate parking to meet future demand. Tenants are expected to share available parking and would not receive "assigned" parking spaces.

The proposed action includes a café and various interpretive installations that would attract more visitors to the Main Post. While some of these visitors would be employees in the park or visitors also destined for other park

uses for which the Anza Esplanade would be a secondary destination, the Anza Esplanade amenities would be a primary destination for others. The additional parking demand for new visitors to the Main Parade during the peak period (midday weekday) is estimated to be about 90 spaces. The additional parking demand would increase the district-wide (excluding Infantry Terrace) midday weekday parking demand to 2,055, which could adequately be accommodated by the proposed 2,150 spaces. The overall parking demand in the Main Post would be somewhat less on evenings and weekends, and the demand of the additional visitors to the Main Parade could be easily accommodated within the proposed supply.

**RESTORATION ALTERNATIVE** The Main Parade would include more passive open space than the Rehabilitation Alternative, and the parking demand for the Main Post district would be similar to the demand anticipated in the PTMP EIS. Special events would be coordinated so that combined parking demand would not exceed parking supply in the Main Post district.

**NO ACTION ALTERNATIVE** Under this alternative, the Main Parade would continue to be used for approximately 740 parking spaces.

## CIRCULATION

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

**ROADWAY NETWORK** The PTMP recognizes that throughout its history, the Main Post has been a destination. From the earliest days of the Spanish garrison, roads from Mission Dolores, Yerba Buena (today, downtown San Francisco), and the Castillo (the Royal Spanish fort that guarded the Golden Gate strait) came together at the Main Post. These roads laid the foundation for today's primary streets. As the Main Post expanded, a rectilinear pattern of streets grew outward from the El Presidio plaza, establishing a hierarchy of entries. Key entries include the former Alameda, the Halleck Street service corridor to the north, the southern arrival at Arguello Boulevard, the Lincoln Boulevard/Montgomery Street guardhouse checkpoint, and Sheridan Avenue to the west. The Main Post continues to serve as a hub for Presidio tenants, residents and visitors. Circulation within the Main Post is fairly confusing, however, in part because the hierarchy of Main Post streets has become unclear.

**TRAFFIC CONDITIONS** The potential impacts of development within the Main Post district on future traffic conditions on Presidio and city roadways are analyzed on pages 302 through 320 of the PTMP EIS. The analysis assumes the road network would be simplified,<sup>11</sup> a transit center would be constructed on the Main Post, and Doyle Drive would be reconstructed. Proposed development throughout the park under the PTMP is estimated to generate 44,407 daily one-way vehicle trips. Main Post land uses are expected to generate approximately 11,860 daily vehicle trips. The PTMP EIS and the subsequent PSH EIS conclude that following mitigation, local intersections would operate at acceptable levels except for the intersection of Lincoln/Bowley/Pershing, which would operate at LOS E, partially due to growth in overall regional traffic

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<sup>11</sup> e.g., clarifying the circulation system, establishing a hierarchy of routes, providing additional signage, closing some roads to auto traffic to provide for recreational use, and reducing traffic on some roads.

passing through the park. Strategies for reducing single-occupancy vehicle trips identified in Mitigation Measure TR-22 *TDM Program Monitoring* would reduce vehicular delays at local intersections.

**CONSTRUCTION TRAFFIC** The short-term impact of construction traffic on the roadway network due to construction activities within the Main Post district and elsewhere within the Presidio is discussed on page 321 of the PTMP EIS. The discussion concludes that, because construction vehicle trips traveling to and from the district would be dispersed, the vehicle trips on other regional roadways would not be substantial and would generally fall within the normal fluctuations of traffic. Mitigation Measure TR-26 *Construction Traffic Management Plan* would require contractors to work with the Trust to develop a plan including information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and alternative pedestrian routes.

**BICYCLE AND PEDESTRIAN CIRCULATION** Bicycle access and pedestrian circulation within the Main Post are reviewed as part of the Presidio Trails and Bikeways Master Plan, which was completed in July 2003. The plan calls for a network of pedestrian and multi-use trails through the Main Post as part of continuous corridors. The Presidio Promenade is one of these trails and would generally follow Lincoln Boulevard to connect the Main Post to the Golden Gate Bridge/Coastal trail to the west and the Lombard Gate and the Letterman Complex on the park's eastern edge.

#### SITE-SPECIFIC ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians or bicyclists.*

*Roadway Network.* The alternative would remove redundant streets, clarify the hierarchy of remaining Main Post streets, and connect key points within and outside the Main Post. Graham Street would serve as the primary north/south arterial "spine" roadway through the Main Post, and Montgomery Street and Funston Avenue would serve as other primary north-south roadways. Lincoln Boulevard and Moraga Street would serve as the major east-west roadways.

*Traffic Conditions.* Three features of the proposed action would affect traffic circulation in the Main Post. First, the relocation of parking supply from the Main Parade to smaller, peripheral lots would result in less vehicular traffic in the center of the Main Post. Second, the interpretive installations and café would result in a marginal increase in traffic traveling to and from the Main Post in the peak commute periods. Finally, the closure of select roadway segments to vehicular traffic would affect turning movements at select intersections. The café and various interpretive installations included in the proposed action are expected to generate an additional 900 one-way vehicle trips to or from the Main Post. The effects of the additional traffic would be greatest at the Main Post, and less intense with distance from the Main Post. Of the additional 900 daily vehicle trips, approximately 50 are expected to occur in the AM peak commute hour and 110 are expected to occur in the PM peak commute hour when traffic is most congested on the Presidio's roadway network

The removal of the north leg of the Arguello/Moraga intersection would result in more right and left turn movements on the southbound approach. This intersection is expected to operate at LOS B and C in the AM

peak hour and PM peak hour, respectively in 2020. Similarly, the removal of the east leg of the Sheridan/Montgomery intersection would affect turning movements at this intersection. This intersection is expected to operate at LOS B and D in the AM peak hour and PM peak hour, respectively in 2020. The change in the geometry of these intersections, the additional traffic generated by the alternative, and the relocation of the parking on the Main Parade would not cause the operation of these or any other intersection to deteriorate to an unacceptable level.

*Construction Traffic.* During the projected 2-year construction period, temporary and intermittent traffic impacts would result from truck movements to and from the project site. Construction vehicles would include trucks hauling construction debris and delivering construction materials and supplies, as well as construction worker vehicles. The volume of construction vehicles accessing the Main Post would vary, depending on the specific construction activity. Construction-related traffic could create some conflicts with local and regional traffic, especially from the larger construction vehicles. These effects, although a temporary inconvenience to those who live, visit or work in the area, would not substantially change the capacity of the existing street system or alter the existing parking conditions. A traffic management plan would be developed prior to construction to provide specific routes and other measures to minimize potential traffic impacts.

*Bicycle and Pedestrian Circulation.* Pedestrian improvements would include converting one block of Arguello Boulevard (between Moraga and Sheridan) and one block of Sheridan Avenue (between Montgomery and Graham) to pedestrian paths, and providing a major north/south pedestrian spine (Anza Esplanade) following the alignment of Anza Street. The system of sidewalks and pedestrian paths would connect the Main Post to an extensive network of bicycle and pedestrian paths extending throughout the Presidio. As described in the Presidio Trails and Bikeways Master Plan, Moraga Street, Funston Avenue, Lincoln Boulevard and Sheridan Avenue would serve as on-street bike routes through the Main Post, and the proposed conversion of roadway segments to pedestrian paths under the proposed action would not affect any of these routes.

**RESTORATION ALTERNATIVE** This alternative would include a vehicular circulation pattern similar to the current roadway network, however the relocation of parking supply in the district would result in slightly different traffic patterns than exist today. Although Sheridan Avenue and Arguello Boulevard near the Main Post would remain open to vehicular traffic, the peripheral location of parking would result in somewhat less traffic on these roadway segments. The relocation of the parking on the Main Parade to smaller peripheral lots would not cause the operation of any intersection to deteriorate to an unacceptable level. Truck movements and construction worker traffic would not significantly impact traffic conditions in the project area.

**NO ACTION ALTERNATIVE** Under this alternative, the current roadway system and location of parking lots would remain unchanged. Traffic would continue to travel through the district as it does today, and the approximately 740 spaces at the Main Parade parking lot would remain. Intersection operating conditions would be similar to those described in the PTMP EIS.

## VISUAL RESOURCES

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

Visual resources within the Main Post district are discussed on page 68 of the PTMP and pages 122 and 123 of the PTMP EIS. The landscape and buildings of the Main Post reflect roughly 225 years of human history. The forest on the steeply sloping southern hillsides provides a dramatic backdrop to the post and striking contrasts to the formal parade grounds. The open bluff along the Main Post's northern edge offers spectacular views of San Francisco Bay and the land features beyond. The Main Post includes ceremonial spaces as well as intimate ones. District features include the parade grounds and the Montgomery Street barracks, as well as remnants of the historic entry circle, garden, and pathway (known as the "Alameda") at Presidio Boulevard/Funston Avenue. Large, monumental spaces are punctuated by features like the flagpole, the firehouse, the former powder magazine, and the heritage trees. The PTMP recognizes that these landmarks have symbolic value and add human scale to the landscape, helping orient visitors.

The potential impacts on visual resources due to "restoring" the Main Parade and adding new construction within the Main Post district are analyzed on pages 248 and 249 of the PTMP EIS. The analysis concludes that Main Parade improvements would result in a positive change to the visual character of the Main Post. New construction would conform to the PTMP Planning Principles and Main Post Planning and Design Guidelines to help ensure that it would be compatible with adjacent historic buildings in scale, massing and materials. To protect the existing character, the guidelines for the Main Post district address overall spatial organization and land patterns, buildings and structures, open space, vegetation, views, and circulation and access. Maximum building heights (30 to 45 feet) identified in the guidelines (page 67 of the PTMP) would not exceed that of existing adjacent buildings or key landscape features (such as the bluffs and forests) and would ensure that key views are not blocked.

### SITE-SPECIFIC ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not substantially degrade the existing visual character or quality of the project site and its surroundings.* Construction of the Main Parade would have a short-term impact to scenic resources over a 2-year period. Adverse construction-related impacts would be associated with clearly visible demolition and construction activities that would detract from the visual setting of the Main Post. Short- and long-range views of the project site would be of a construction zone, which would visually detract from the national park character of the area. The presence of construction workers, construction-related truck trips, and heavy equipment activity would further detract from the visual character of the project site. Construction areas would be fenced to visually screen construction activity, and construction equipment and materials would be consolidated to staging areas at the end of each work day to limit the visual intrusion of construction equipment during non-working hours.

Following construction, the alternative would have a beneficial effect on views of the Main Parade due to the landscape and design improvements to the project site. Removal of approximately 8.5 acres of asphalt pavement (net following construction) would greatly reduce the visual presence of parking and roads and would have a positive effect on the visual unity of the Main Post. Parking spaces would be decentralized, and



vegetative screening would be used to block views of new parking areas, further lessening adverse development-related impacts to scenic resources. Replacement of pavement with new built features would substantially enhance existing views by improving the natural park-like character and revealing the historic nature of the project site while, at the same time, opening up new views within the site. The layout of the Main Parade would have a pedestrian focus and would provide new opportunities for pedestrian views of prominent visual features. Developing the Anza Esplanade and providing new facilities, such as picnic areas, walkways, interpretive areas, site design detailing and landscaping would substantially enhance the visual character of and viewing opportunities within the site for visitors and tenants (Figure 8).

The proposed action would also substantially enhance views of the project site from Infantry Terrace to the south and Doyle Drive and Crissy Field to the north. The proposed action would help visually link the Main Post and San Francisco Bay and beyond by creating a smooth and more natural transition of open space.

**RESTORATION ALTERNATIVE** Visual changes under this alternative would be similar to the proposed action. Removal of asphalt paving and restoration of the Main Parade with a grass surface would substantially enhance existing views and open up new views within the project site (Figure 9).

**NO ACTION ALTERNATIVE** Under this alternative, no major site restoration would take place, so there would be no significant impacts on scenic resources or viewing. The parking lot would continue to dominate existing views within the project site and from surrounding areas.

## VISITOR EXPERIENCE, INTERPRETATION AND RECREATION

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The potential impacts from expanded programs, interpretive and educational opportunities, and recreational activities within the Main Post district on the experience of park visitors<sup>12</sup> are analyzed on pages 292 through 301 of the PTMP EIS. The analysis assumes that open space would be expanded at, and facilities for the visiting public would be concentrated in the Main Post and Crissy Field districts. These include larger open spaces that would be improved for informal play (such as the Main Parade) and small and large visitor amenities within Main Post buildings. Cultural facilities would attract more recreational visitors annually to the park. Peak visitor use would occur primarily on weekend days and holidays with good weather.

### SITE-SPECIFIC ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action is not expected to adversely impact current or planned visitor services or recreation facilities.* Rehabilitation of the Main Parade would result in adverse construction-related impacts associated with temporary interference with access to the project site. The presence of construction equipment, visibility of construction activities, air and noise effects, and removal of parking lot pavement during construction would temporarily diminish the value of sightseeing opportunities in the area. The Main Parade would remain closed for the duration of construction (approximately 2 years). Traffic control

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<sup>12</sup>Impacts on visitor experience include visitor orientation, interpretation, public access, park tenants, events and cultural programs.

measures, air quality and noise measures, and public notice would be employed to reduce effects related to visitor access.

Rehabilitation of the Main Parade would improve visitor and interpretive opportunities by creating an experience more connected with and unique to the park; providing a pedestrian-focused site design, including a promenade, viewing plazas, and removal of the 6.2-acre parking lot that currently detracts from the visitor experience. The redesign of the parade ground would create a pedestrian district that would establish a network of pathways to link buildings and public outdoor spaces. The district would encourage walking and bicycling in the project area and would reduce traffic hazards to pedestrians and bicyclists. The Anza Esplanade would serve as the central pedestrian corridor, and connections between the Main Post and Crissy Field would be established. Implementation of the alternative would result in an increase of 0.9 miles of trails and sidewalks. In addition, seating, drinking fountains and discreet night lighting would be included to make the area safer, more comfortable, and more convenient to people on foot.

Based on visitor amenities and land use characteristics, the proposed action would attract approximately 325,000 additional recreational visitors annually to the park. Mitigation measures identified in the PTMP EIS would ensure that visitation levels would not exceed desired conditions, and that unacceptable impacts to park resources and visitor experiences would not occur. These measures include limitations of visitor opportunities (Mitigation Measure CO-4), prohibitions on visitor uses (Mitigation Measure CO-5), management controls (Mitigation Measure CO-6), and monitoring of visitor levels (Mitigation Measure CO-8).

**RESTORATION ALTERNATIVE** Under this alternative, visitor-serving and recreational opportunities would be increased and diversified through the creation of the restored Main Parade. Similar to the proposed action, this alternative would provide settings for both intimate and large-group gatherings. Landscaped areas and the large open space would be improved for passive recreation and informal play. Without the Anza Esplanade, the El Presidio foundations exposure, café and other visitor amenities, this alternative would attract few recreational visitors to the park (i.e., would not serve as a destination in itself) but would rather complement facilities and programs already in place or proposed on the Main Post. However, interpretive features and elements at the former building sites along Anza Street would improve the quality of facilities for visitors.

**NO ACTION ALTERNATIVE** This alternative would not contribute to current or planned visitor services or recreation facilities within the Main Post. The parking lot would remain and Anza Street would not change. There would be no separated pedestrian or bicycle paths and occasional recreational use would continue to be shared with moving and parked vehicles. In general, the vast hardscape condition of the area would continue to take away from the visitor use and enjoyment of the surrounding buildings and landscape. Only minimal interpretive or orientation signage would be installed. Adjacent facilities and sites would continue to be relied on for purposes of interpretation and delivering visitor information.



**Figure 8**  
**View Along Anza Esplanade (Rehabilitation Alternative)**

Source: Presidio Trust, June 2007

November 2007  
Main Post Environmental Assessment





**Figure 9**  
**View Along Anza Street (Restoration Alternative)**

## HAZARDOUS MATERIALS

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The PTMP EIS does not analyze the cleanup of hazardous substances, pollutants and contaminants at the Presidio. Rather, pages A-6 through A-10 in Volume III, Appendix A of the document provides information regarding the currently known extent of contamination. The assessment and clean-up activities related to hazardous substances, pollutants, and contaminants on the Presidio are being conducted by the Trust with oversight by the California Department of Toxic Substances Control and the Regional Water Quality Control Board. This program involves extensive investigation, analysis, reporting and remedial design and remedial action strategies. The characterization of contaminated sites, exposure pathways and potential health risks associated with reuse and redevelopment at the Presidio are addressed under regulatory controls separate from the NEPA process and the PTMP EIS.

Hazardous materials within the Presidio are remediated in accordance with remediation/stabilization and removal plans approved by the Presidio Trust and all applicable federal and state laws and regulations, which require protection of human health and the environment. Implementation of the plans ensures that exposure does not occur during the course of the cleanup activities. Institutional controls would be in place to protect future workers (e.g., notification to maintenance and construction workers). No improvements within areas where contamination exists would take place prior to remediation of those areas. The risk of human exposure following remediation is low and precautionary measures would be implemented. Because remedial actions would be protective of human health and the environment and would expedite and enhance the beneficial reuse of identified contaminated areas, the PTMP EIS concludes that potential impacts to human health, safety and the environment following cleanup would not be significant.

### SITE-SPECIFIC IMPACT ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not pose a substantial present or potential hazard to human health or the environment.* On the basis of Army archive research and the Trust's experience performing remediation in the Presidio, the Main Parade area is not believed to contain significant quantities of waste or petroleum products. Two areas within the Main Parade project area contain backfill soil that had been thermally treated by the Army to remove petroleum (LTTD soil): 1) a tank excavation on the west side of Building 34, and 2) a trench that formerly contained a fuel distribution pipe that ran down Mesa Street, across the north end of the Main Parade adjacent to Lincoln Boulevard, and along Taylor Road. The Trust's Low Temperature Thermally Treated Soil Tracking and Management Plan, Presidio of San Francisco (2004) provides guidelines for handling LTTD soil encountering during construction projects. In this case it is expected that LTTD soil encountered within or adjacent to the Main Parade would be segregated from other soils, removed and disposed off-site at a licensed landfill. Similarly, if petroleum contamination is encountered in the project area, it would be handled in accordance with the Petroleum Contingency Plan, Presidio of San Francisco (2004).

**RESTORATION ALTERNATIVE** Similar to the proposed action, actions would be taken as part of site restoration to ensure that any encountered LTTD soil is disposed of and petroleum contamination is handled in accordance with applicable Trust plans and procedures to minimize risk to park visitors, workers and the environment.

**NO ACTION ALTERNATIVE** Under this alternative, there would be no disturbance of sites potentially containing hazardous materials.

## GEOLOGY AND SOILS

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The impact topic of geology and soils is discussed on page A-5 in Appendix A of the PTMP EIS. The Main Parade straddles a long narrow canyon that contains low-density artificial fill that was placed over soft Bay Mud, Colma Formation (a firm sandy clay soil) and colluvium (a thick soil composed of particles eroded from nearby slopes). This area has many of the same geologic characteristics as the nearby Marina District that experienced extensive damage during the Loma Prieta earthquake.<sup>13</sup> This geologic subgrade is designated on the California Seismic Hazards Zone Map<sup>14</sup> prepared under the Seismic Hazards Mapping Act of 1990 as a zone requiring investigation for seismically induced liquefaction<sup>15</sup> hazards. Future earthquake ground motion is expected to be quite high due to the soft sandy hydraulic fill and the proximity of the San Andreas fault (about 7 miles southwest of the project site), the Hayward fault (about 12 miles northeast) and other major, active regional faults. The PTMP EIS concludes that site-specific development projects would require supplemental review to evaluate geologic and seismic hazards.

### SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not increase the threat to public health and safety due to seismic hazards.* A geotechnical investigation, which explored subsurface conditions, performed laboratory testing on materials encountered, and included subsurface data from previous nearby projects, was performed for the project site.<sup>16</sup> The results of the investigation would be used to develop recommendations regarding the geotechnical aspects of project design and construction. Geotechnical factors at the site that would be considered are the potential for liquefaction, the presence of non-engineered, heterogeneous fill, and the depth to groundwater. Report recommendations would address potential hazards including site preparation, earthwork and foundation design.

<sup>13</sup>Both are mapped Quaternary artificial fill (Qaf) by the U.S. Geological Survey (USGS) in USGS Professional Paper 782 (Julius Schlocker 1974).

<sup>14</sup>The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. The Seismic Hazards Zone Map for San Francisco can be viewed at [http://gmw.consrv.ca.gov/shmp/download/pdf/ozn\\_sf.pdf](http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sf.pdf). The Trust uses the map in its land use planning and building permit processes, and requires site-specific geotechnical investigations be conducted identifying the hazard and formulating mitigation measures prior to permitting most developments designed for human occupancy within areas prone to liquefaction and earthquake-induced landslides.

<sup>15</sup>Liquefaction occurs when loose, water-saturated sediments lose strength and fail during strong ground shaking.

<sup>16</sup>A copy of the geotechnical investigation (Olivia Chen Consultants 1999) is on file and available for public review at the Presidio Trust library.

The Trust would review final building plans for the new infill construction during the permit review process to determine existing hazards and assess requirements for mitigation. For any infill construction in an area of liquefaction potential, the Trust would, in its review of the building permit application, require the tenant to prepare a site-specific geotechnical report that assesses the nature and severity of the hazards on the project site and recommends project design and construction features that would reduce the hazards. To ensure compliance with building code<sup>17</sup> provisions to the maximum extent feasible, when the Trust reviews the geotechnical report (if required) and building plans, it would determine the adequacy of necessary engineering and design features to reduce the potential damage to structures from groundshaking and liquefaction. Therefore, potential damage to structures from geologic hazards on the project site would be ameliorated through the Trust requirement for a geotechnical report and review of building permit applications. The Trust would approve the plans only when the nature and severity of the seismic hazards at the site have been evaluated and appropriate mitigation measures have been proposed.

Construction activities, including earthmoving and grading operations for the Main Parade improvements and parking lot construction, have the potential to disturb and expose soil to forces of wind and water erosion. The total amount of soil disturbance for construction is estimated to be 52,500 cubic yards. Wherever feasible, all soils affected by construction would be salvaged for reuse on-site and for other Presidio site restoration activities.<sup>18</sup> As discussed in the Air Quality and Water Resources sections, the Trust would minimize soil erosion by requiring contractors to employ Best Management Practices to contain disturbances within localized areas. Routine monitoring and reporting of BMP performance would be conducted pursuant to the SWPPP.

**RESTORATION ALTERNATIVE** This alternative would not involve any new infill construction and would not alter the overall topography of the project site. Therefore, the threat to public health and safety due to seismically induced liquefaction hazards would remain.

**NO ACTION ALTERNATIVE** Under this alternative, the threat to public health and safety in the event of an unavoidable geologic hazard would remain.

## **BIOLOGICAL RESOURCES**

### **SUMMARY OF PTMP EIS IMPACT ANALYSIS:**

Biological resources within the Main Post district are identified on pages 83 through 119 of the Presidio PTMP EIS and page 77 of the PTMP. The Main Post consists primarily of landscape vegetation that provides a rich cultural context and a unique historic sense of place, which sharply contrasts with the Presidio's forests and native plant communities. The Main Post's vegetation can be characterized by ornamental trees (of which some are specimen species), expansive open grassy areas (such as the unpaved parade grounds), maintained lawns, and flowering foundation planting or low hedges. The landscaped vegetation generally has low wildlife value. However, some of the ornamental plantings, such as the eucalyptus and palms, despite their introduced

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<sup>17</sup>The Trust uses nationally accepted model building codes, including the 2003 International Building Code.

<sup>18</sup>As discussed in the Hazardous Materials section, unsuitable materials such as contaminated soils would be appropriately disposed of offsite.

status, offer fruits, berries and shelter that attract year-round resident and migrant birds. As shown on page 89 of the PTMP EIS, no native plant communities or species occur on or near the Main Parade.

The potential impacts of development within the Main Post are analyzed on pages 220 through 238 of the PTMP EIS, and in the U.S. Fish and Wildlife Service (USFWS) Biological Opinion (2002). The analyses assumes that no construction activities (such as placement of fill material, mechanized land clearing, land leveling and road construction) would occur beyond existing developed areas and no existing natural habitat would be displaced. The PTMP EIS analysis indicates that future uses would be subject to the mitigation measures identified in the EIS and the “minimization measures” included in the Biological Opinion, as well as site-specific planning and environmental review that would take place prior to any substantial construction or demolition. The mitigation measures include:

- Restricting the use of non-native invasive plant species (Mitigation Measure NR-1 *Native Plant Communities*)
- Following park guidelines for vegetation removal for protection of nesting birds (Mitigation Measure NR-9 *Wildlife and Wildlife Habitat*)

#### SITE-SPECIFIC IMPACT ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, or any threatened and endangered species.* The project site is in a developed area and does not support or provide habitat for any threatened or endangered wildlife species. The proposed action would not interfere with any native resident or migratory species. Furthermore, the project site is not located within or near any riparian habitat, sensitive natural community, or federally protected wetlands.

*Control of Invasive Species.* The proposed action would include landscape vegetation plantings, including ornamental shrubs, trees, lawns and groundcover. When selecting plants for landscaping, plant species that can escape landscaped areas and invade native plant communities and other areas would be avoided. The Trust’s lists of approved and prohibited plant material for consideration in designed landscapes would be reviewed in plant selection. Plants that may be considered for planting and not found on the lists would be evaluated by qualified Trust staff specialists to determine their degree of invasiveness, and whether they can be successfully controllable to limit substantial impacts on park resources.

*Protection of Nesting Birds.* If project activity commences during the bird nesting season (January 1 to August 15), surveys in areas of suitable nesting habitat within 500 feet of project activity would be conducted. If no active nests are found, no further mitigation would be required. If construction is initiated and completed outside of the bird nesting season, no mitigation is required. If an active bird nest is found, a qualified biologist must determine that the activity has no potential to adversely affect the nest.<sup>19</sup> Otherwise, appropriate buffers

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<sup>19</sup>Bird nests that would be protected are those stipulated in the Migratory Bird Treaty Act (16 U.S.C. 703 *et seq.*). However, the USFWS has determined that the protections of the Migratory Bird Treaty Act do not apply to nonnative, human-introduced bird species such as the rock pigeon (the familiar “pigeon” of cities and parks) [70 Fed. Reg. 12710-12716 (Mar. 15, 2005)].



would be established and no project activity would commence within the buffer area until the biologist confirms that the nest is no longer active.

*Preservation of Heritage Trees.* The two heritage trees within the Main Parade would be fenced during construction and protection measures in the Trust's Tree Preservation Specifications would be followed in order to minimize effects to the tree root systems as much as possible.

**RESTORATION ALTERNATIVE** This alternative would result in the same impacts to biological resources as the proposed action. No existing plant communities would be affected, nor would any state or federal threatened or endangered animal species. The alternative would not cause any impacts to any riparian habitat, sensitive natural community, or federally protected wetlands. Furthermore, invasive species would be controlled and nesting birds would be protected, as would the existing heritage trees.

**NO ACTION ALTERNATIVE** Under this alternative, there would be no alteration to native plant or wildlife habitat.

## **WATER RESOURCES**

### **SUMMARY OF PTMP EIS IMPACT ANALYSIS:**

**WATER SUPPLY** The potential impacts of development within the Main Post district on domestic water and irrigation demand are analyzed on pages 328 through 333 of the PTMP EIS. The Trust operates a facility that treats water from Lobos Creek to provide potable water to the park under permit from the California Department of Health Services (DHS). Supplemental water is purchased from the City and County of San Francisco (CCSF) as needed. Similar to Presidio supplies, the amount of CCSF water used varies significantly based on the type of water year. Between 1999 and 2003, CCSF provided between 6 and 18 percent of the total water consumed at the park, and the remainder was provided by Lobos Creek. During this period, use of CCSF water ranged from 0 gallons per day in the winter and spring to 1 million gallons per day (mgd) at the peak of the dry season.

The San Francisco Public Utilities Commission (SFPUC), the CCSF department that provides water to San Francisco and surrounding communities, estimates that the current total demand for water from its system is between 90 and 91 mgd.<sup>20</sup> The SFPUC identifies the Presidio as an "in-city customer/non-residential" and therefore historical water use and projected water demands of Area B are included in its Urban Water Management Plan.<sup>21</sup> These projections are based on the CCSF Planning Department's Land Use Allocation 2002,<sup>22</sup> which takes into account projected future development within the Presidio. Because the Presidio is a retail customer, the purchase and use of water from the SFPUC is subject to its water shortage regulations, including mandatory water rationing programs and rate structures adopted during drought conditions.

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<sup>20</sup> San Francisco Public Utilities Commission (SFPUC), Urban Water Management Plan for the City and County of San Francisco, December, 2005.

<sup>21</sup> Letter to Mr. Craig Middleton, Presidio Trust from Karen Hurst, Regulatory Specialist, SFPUC Water Enterprise – Water Resources Planning Division. Re: Response to Letter of 11/15/05 Commenting on Draft 2005 Urban Water Management Plan for the City and County of San Francisco, December 9, 2005.

<sup>22</sup> CCSF, Land Use Allocation 2002, October 6, 2003.

The Trust is committed to reducing the demand for off-site water resources by conserving water and by implementing water recycling in northern and eastern sections of the park (see PTMP, page 55). Phase one of the Trust's water recycling plant, which is currently under construction, will provide approximately 200,000 gallons per day (gpd) for irrigation purposes, reducing dependence on Lobos Creek and CCSF water.

New construction within the district and "greening" of the Main Parade as envisioned in the PTMP are taken into account in the Presidio's water demand calculations.<sup>23</sup> The analysis assumes that the Main Parade would have an average daily irrigation demand of approximately 11,300 gallons. Mitigation Measure UT-1 *Demand Management* would require implementation of Best Management Practices to encourage water conservation.

**WATER QUALITY** Water quality issues within the Presidio are discussed on page 121 of the PTMP EIS. The Presidio has implemented and is operating under the Presidio of San Francisco Stormwater Management Plan (SMP) (Dames & Moore 1994), which includes a detailed Storm Water Pollution Prevention Plan (SWPPP) that outlines erosion prevention and sedimentation control measures used by the Presidio to avoid contamination of storm drains and surface water resources. The SMP is being updated to reflect changes in storm water routing as well as new Phase II stormwater permitting requirements. Water quality is also addressed for specific water resources, including Crissy Marsh (Area A).

The impacts of new construction on the Presidio's water resources are analyzed on pages 245 and 246 of the PTMP EIS. Various Presidio operations could result in indirect downstream impacts due to erosion, sedimentation, and discharges of other pollutants. However, the analysis also notes that pavement removed and replaced with more permeable surfaces would increase groundwater quality. Structural and operational stormwater pollution prevention measures, referred to as BMPs, would be developed and employed to reduce stormwater runoff volumes, protect water quality and meet water quality standards (Mitigation Measure NR-15 *Best Management Practices* and NR-19 *Future Design*).

**STORM DRAINAGE** The impact due to stormwater runoff within the Main Post district are assessed on pages 335 through 341 in the PTMP EIS. The assessment estimates the amount of net new construction (i.e. new construction less demolition) in the district to determine changes in permeable surfaces and thus stormwater runoff. The assessment does not account for the decrease in impervious surfaces and reduction in volume of stormwater runoff that would occur associated with conversion of the Main Parade from pavement to more permeable materials. Nevertheless, the analysis determines that no additional demands or impacts on the district's stormwater systems are anticipated. The analysis notes that the stormwater systems are designed for a 50-year event, and can therefore accommodate additional flows. Mitigation Measure UT-7 *Stormwater Reduction* would require that infrastructure improvements be installed prior to new construction to minimize stormwater runoff and comply with existing water quality standards, regulatory requirements, and the Trust's stormwater quality control (pollution prevention) program.

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<sup>23</sup>See Table 1: Domestic Water Demand Calculations and Table 2: Irrigation Water Demand in Appendix H of the PTMP EIS for domestic water demand calculations.

#### SITE-SPECIFIC IMPACT ANALYSIS OF MAIN PARADE ALTERNATIVES:

The Main Parade is a 6.2 acre impervious area directly connected to the storm drain system discharging into San Francisco Bay (either directly or through Crissy Marsh), and as such, is a contributor to non-point source pollution. As stormwater runoff flows across the parking lot, oils, sediments, metals and other pollutants are collected and concentrated, and has no opportunity for filtering by plant material or infiltration into the soil. It also increases in speed and volume, which causes higher peak flows downstream, increasing flood and erosion potential.

**REHABILITATION ALTERNATIVE** *The proposed action would not substantially exceed the capacity of the existing or planned stormwater drainage system, increase runoff, erosion or flooding on- or off-site, degrade surface or ground water quality, or violate any water quality standards or waste discharge requirements.*

The proposed action would increase pervious areas from 9.2 to 16.7 acres, and decrease impervious areas from 13.8 to 6.3 acres within the affected watershed subbasins. By comparison of the stormwater conditions before and after project development, the discharge rate would be reduced by 19 cubic feet/second (cfs) for a one hour design-storm (from 47.2 cfs to 28.2 cfs).<sup>24</sup>

*Construction Activities.* Rehabilitation of the Main Parade would involve pavement removal, excavation, grading, and stockpiling of soil. During construction, runoff generated during rainstorms could result in erosion of exposed soil and stockpiled soil. Sediment transported by runoff could cause sedimentation in downstream drainages and/or the sewer system. The accumulation of sediment could result in blockage of flows, potentially resulting in localized ponding or flooding and impacts to aquatic habitat. In addition, it is possible that suspended sediment could affect aquatic biota in receiving waters. As required by Mitigation Measure NR-15 *Best Management Practices* and NR-19 *Future Design*, a SWPPP would be developed to identify potential pollutant sources that could affect the quality of runoff. The SWPPP would also identify and implement BMPs to reduce pollutants in stormwater discharges from the construction site. Control measures could include construction of detention structures, installation of siltation fencing, appropriate grading practices, dust control, soil stabilization and temporary seeding. The SWPPP would specify a monitoring program to monitor storm drain runoff into Crissy Marsh. Compliance with existing regulations, programs, and the SWPPP would adequately address potential construction stormwater runoff impacts.

*Parking Lots.* New parking lots could contribute a number of substances, such as trash, suspended solids, hydrocarbons, oil and grease, and heavy metals that could enter receiving waters through stormwater runoff or non-stormwater discharges. As required by Mitigation Measure UT-7 *Stormwater Reduction*, relocation and reconfiguration of parking areas would involve limiting impervious surfaces to the extent feasible,<sup>25</sup> and retrofitting and upgrading stormwater treatment consistent with the SMP. The proposed action would result in the reduction of total runoff volume and would also result in a reduction of pollutant loading associated with parking areas since the approximate total area of impervious surface subject to stormwater runoff would be

<sup>24</sup> Stormwater calculations prepared by Bellecci & Associates, Inc are on file and available for public review at the Presidio Trust library.

<sup>25</sup> The Trust would minimize impervious surfaces by using pervious pavement for paved areas. Pervious pavement designs are explored in the Trust's Pervious Pavement Study (Sasaki 2006) available for review at the Presidio Trust library.

reduced. Reducing the overall impervious land coverage and directing runoff from impervious areas to pervious areas for retention/detention and infiltration would eliminate the “directly connected impervious area” condition that currently exists. The Trust would also follow protocols including using good housekeeping practices, following appropriate cleaning BMPs, and training employees to prevent or reduce the discharge of pollutants from parking areas.

*Lawn and Landscaped Areas.* Stormwater runoff from landscaped areas would be minimized by maximizing groundwater infiltration and stormwater drainage at the project site. A thorough site grading and drainage plan utilizing appropriate design measures would be implemented. Groundwater percolation would also be promoted through soil decompaction and permeable ground cover materials. Plants with low irrigation requirements (for example, native or drought tolerant species) and that minimize or eliminate the use of fertilizer or pesticides to sustain growth would be selected. Only plant materials adapted to the site’s microclimate would be installed. Trust-supplied wood chips would be used in planter areas without ground cover to minimize sediment in runoff.

Projected average water demand (including domestic and irrigation demand) for the proposed action is 11,500 gpd. Irrigation demand would be reduced by implementing the various BMPs and irrigation standards described in this section, and by using recycled wastewater when available.

Irrigation water provided to landscaped areas may result in excess irrigation water and pollutants, such as pesticides, herbicides and fertilizers, being conveyed into the storm drain system. Project plan designs would include application methods of irrigation water that minimize runoff of excess irrigation water into the stormwater conveyance system. Methods to improve water use efficiency and reduce excessive irrigation runoff as described in the Trust’s Construction Standards for Landscaping and Irrigation Projects would be followed. These include:

- Connecting to the central automatic control system to prevent irrigation after precipitation
- Designing an irrigation system to the landscape area’s specific water requirements
- Using flow reducers or shutoff valves triggered by a pressure drop to control water loss in the event of broken sprinkler heads or lines

In addition, the Trust’s Roads and Grounds Integrated Pest Management Program<sup>26</sup> (IPM) would be implemented at the Main Parade to minimize pesticide drift, runoff and groundwater contamination. All herbicides and pesticides proposed for use would be rapidly biodegradable, approved in advance by the Trust IPM Coordinator, and applied according to manufacturer’s label recommendations and in conformance to all applicable laws and regulations.

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<sup>26</sup> IPM is an ecosystem-based strategy that focuses on long-term prevention of pests and their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant plant varieties. Pesticides are used only after monitoring indicates they are needed, according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment. The Trust’s Roads and Grounds IPM Program (2002) is on file and available for review at the Presidio Trust Library.

**RESTORATION ALTERNATIVE** Similar to the proposed action, during construction, sediment could be transported by the runoff and discharged into San Francisco Bay, resulting in water quality degradation. The required SWPPP would control sediment in construction site runoff and adverse impacts are not expected. The approximate total area of impervious surface would decrease from 13.8 acres to 6.7 acres. Thus, this alternative would be subject to slightly less stormwater runoff when compared to the proposed action. Projected average water demand would also be less than the proposed action (10,700 gpd versus 11,500 gpd under the proposed action). Implementation of various BMPs and irrigation standards described in this section and use of recycled wastewater when available would decrease irrigation demand.

**NO ACTION ALTERNATIVE** Under this alternative, there would be no impervious surface reductions. Impervious areas would remain directly connected to the storm drain system. BMPs to treat runoff would be investigated as funding permits. There would be no increased water demand above existing conditions.

## AIR QUALITY

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The air quality impacts of development within the Main Post district are analyzed on pages 252 through 260 in the PTMP EIS pursuant to Bay Area Air Quality Management District guidelines. The analysis concludes that construction activities requiring use of heavy equipment would create fugitive dust particulate matter that could cause adverse effects on local air quality; and projected motor vehicle use would not cause violations of ambient air quality standards for carbon monoxide at congested intersections.

Feasible BAAQMD-recommended control measures for fugitive dust particulate matter (PM<sub>10</sub>) would be required to limit adverse effects on air quality during demolition and construction activities (Mitigation Measure NR-20 *Basic Control Measures*). The Trust's TDM Program, which consists of activities conducted by the Trust and by the park's tenants, would implement relevant transportation control measures of the 2000 Clean Air Plan (CAP) to reduce the number and length of vehicle trips, and thus minimize air emissions and maintain consistency with the CAP (Mitigation Measure NR-21 *Transportation Control Measures*).<sup>27</sup>

### SITE-SPECIFIC IMPACT ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not substantially increase vehicle emissions or emissions of other air pollutants, or generate significant nuisance dust or odors.* Construction-related emissions would result from a variety of construction activities, including excavation, vehicle travel, and vehicle and equipment exhaust, but would be short-term in duration and localized. Older adults in the adult rehabilitation center (Building 386) and children in the child development center (Building 387) would be sensitive to air quality impacts of the project. Feasible BAAQMD control measures for dust (PM<sub>10</sub>) would be implemented as part of a Construction Emissions Mitigation Plan to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. The plan would also incorporate U.S. Environmental Protection Agency (EPA) recommendations for construction equipment exhaust emissions

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<sup>27</sup>Note: CAP revisions made since preparation of the PTMP EIS incorporate the growth anticipated under the PTMP.

that were provided during their review of the Trust's Public Health Service Hospital project (Mitigation Measure NR-X Construction Equipment Exhaust Measures).<sup>28</sup> These measures require that all construction equipment used at the construction site would:

- 1 Not idle for more than ten minutes
- 2 Not be altered to increase engine horsepower
- 3 Be newer and cleaner (1996 or newer)
- 4 Be staged away from sensitive receptors (Buildings 386 and 387) as well as away from fresh air intakes to buildings and air conditioners
- 5 Include particulate traps, oxidation catalysts and other suitable control devices
- 6 Use ultra low sulfur diesel fuel with a sulfur content of 15 parts per million or less or other suitable alternative diesel fuel, unless the fuel cannot be reasonably procured in the geographic area
- 7 Be tuned to the engine manufacturer's specifications in accordance with a defined maintenance schedule

The 6.2-acre parking lot, with its minimal landscaping and vast expanse of dark pavement materials could currently be considered an "urban heat island" that currently contributes to ozone (smog) formation.<sup>29</sup> The alternative would eliminate this heat island by using cool (high albedo) paving materials and planting trees and shrubs.<sup>30</sup> In addition, the alternative would make pedestrian travel and bicycle access safer, more convenient and more attractive, thus promoting walking and bicycling to improve air quality.

**RESTORATION ALTERNATIVE** Similar to the proposed action, this alternative would not cause a significant air quality impact. BAAQMD-recommended PM<sub>10</sub> control measures and U.S. EPA recommendations for construction equipment exhaust emissions would be implemented during construction. Following implementation, emissions would fall below significance thresholds. Greening of the restoration parking lot would result in energy and pollution benefits similar to the proposed action.

**NO ACTION ALTERNATIVE** As no construction would occur under this alternative, there would be no impact upon air quality, and the parking lot would remain a heat island.

## NOISE

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The noise impacts of development within the Main Post district are analyzed on pages 260 through 262 in the PTMP EIS using compatibility standards established by the CCSF and the Federal Highway Administration. The analysis suggests that various locations would experience increased noise from traffic internal to the

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<sup>28</sup> PHS Final Supplemental EIS, page 170.

<sup>29</sup> Higher temperatures could mean more air pollution. Ground-level ozone is formed by a chemical reaction between volatile organic compounds (VOCs) and oxides of nitrogen (NO<sub>x</sub>) in the presence of sunlight. Ozone concentrations can reach unhealthful levels when the weather is hot and sunny with little or no wind. Refer to the Heat Island Group's website (<http://eetd.lbl.gov/HeatIsland/HeatIsland>) for good information on the "heat island effect" and the energy and pollution benefits of reflective surfaces and urban vegetation.

<sup>30</sup> Use of light colored surfacing materials is also a recommended stationary source control measure in the 2000 Clean Air Plan.

Presidio, including areas along Lincoln Boulevard, the San Francisco National Cemetery, and the residences along Riley Avenue nearest to Sheridan Avenue. The analysis concludes that while traffic volumes would increase noise above background levels, the increase would not be substantial (i.e., would not exceed applicable standards) and would not warrant mitigation (except the current practice of enforcing noise insulation requirements equivalent to the standards of Title 24 to provide an acceptable interior noise environment following building rehabilitation).

The PTMP EIS notes that construction activities would create short-term impacts on the noise environment. This noise could at times be distinctive and disruptive to park users and other people within close proximity of the activity. During construction, contractors and other equipment operators would need to comply with the San Francisco Noise Ordinance<sup>31</sup> (Article 29 of the San Francisco Police Code), which prescribes working times, types of construction equipment to be used, and permissible noise emissions (Mitigation Measure NR-23 *General Construction/Demolition Noise*).

#### SITE-SPECIFIC IMPACT ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not expose persons to or generate noise levels in excess of applicable standards.*

*Construction Equipment.* Construction would result in increased noise levels from earthmoving and construction activities. The types of construction equipment to be used would typically generate noise levels of 70-80 A-weighted decibels (dBA) at a distance of 100 feet while the equipment is operating. Construction equipment operations would vary from intermittent to fairly continuous, with multiple pieces of equipment operating concurrently. Such noise levels, however, would not be continuous throughout the day and would be restricted to daytime hours. According to the PTMP (Figure 25, page 130), the nearest noise sensitive area to the project site is the residences along Riley Avenue. These residences are at least 400 feet from the edge of the Main Parade, buffered from the Main Parade by the Montgomery Street Barracks (Buildings 100–105), and currently experience relatively high noise levels (i.e., commonly above 65 dBA<sup>32</sup>) from Doyle Drive traffic, which would tend to mask construction noise. Other nearby sensitive receptors are the adult rehabilitation center in Building 386 (located 600 feet from the edge of the Main Parade) and the child development center in Building 387 (at 700 feet). Trust-enforced noise standards would be applied to minimize noise disturbance in the vicinity of the project site during the construction process.

*Maintenance Activities.* Maintenance activities for the newly occupied use, including lawn mowing, vegetation trimming, and trash and litter removal would result in minimal or no increase in noise levels compared with current conditions.

*Special Events.* Special events that would be held periodically for limited durations at the Main Parade could temporarily increase ambient noise levels in the vicinity of the Main Parade. The majority of these special events are expected to be smaller outdoor seminars, lectures, festivals, exhibits, demonstrations, or hands-on

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<sup>31</sup>The San Francisco Noise Ordinance can be viewed at <http://www.municode.com/Resourcesgateway.asp?pid=14140&sid=5>.

<sup>32</sup>Short-term noise measurement taken on March 21, 2007.

participation that would have limited or no substantial noise effects. The Trust would impose limitations on the equipment used and the time and area within which the event is allowed to ensure that noise does not unreasonably interfere with visitors or tenants (36 CFR 1002.50). Should terms and conditions not be sufficient to reduce noise from foreseeable special events, additional mitigation would be identified.

**RESTORATION ALTERNATIVE** Similar to the proposed action, this alternative would attenuate noise during construction to minimize disturbance in the vicinity of the project site. The restored Main Parade and traffic generated by its uses would not emit noise in excess of permissible levels.

**NO ACTION ALTERNATIVE** This alternative would not create noise above existing background levels.

## **SOLID WASTE**

### **SUMMARY OF PTMP EIS IMPACT ANALYSIS:**

The impacts of demolition, construction and rehabilitation activities at the Presidio under the PTMP on the regional waste stream are analyzed on pages 341 through 344 of the PTMP EIS. While the PTMP assumes that asphalt and concrete would be recycled and used for paving where practical, it does not estimate the amount of solid waste that would be generated by removing asphalt pavement at the Main Parade.

In 1999 (latest figures available), asphalt paving made up about 0.1 percent of San Francisco's commercial waste stream, or 1,209 tons.<sup>33</sup> The quantity of asphalt pavement is not reported separately on a statewide basis. However, generation of "inert solid waste," which consists of concrete, asphalt, dirt, brick and other rubble, was conservatively estimated at 8.2 million tons. The estimated recycling rate for inert solid wastes was 57 percent; the remainder was disposed of in regional landfills.<sup>34</sup>

### **SITE-SPECIFIC IMPACT ANALYSIS OF MAIN PARADE ALTERNATIVES:**

**REHABILITATION ALTERNATIVE** *The proposed action would not substantially increase the amount of material that enters the commercial/industrial waste stream.* Rehabilitation of the Main Parade would generate approximately 20,000 tons of asphalt pavement, base and subbase, of which 100 percent would be recycled and diverted from regional landfills. The reclaimed materials would be crushed and used as an aggregate source for roadways and parking lots within and outside the Presidio.

**RESTORATION ALTERNATIVE** Similar to the proposed action, this alternative would recycle and reuse existing pavement as an aggregate source to conserve diminishing resources and avoid landfill disposal.

**NO ACTION ALTERNATIVE** This alternative would have no impact on the commercial waste stream.

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<sup>33</sup> Refer to California Integrated Waste Management Board Construction and Demolition Debris Recycling <http://www.ciwmb.ca.gov/ConDemo/>.

<sup>34</sup> Refer to California Integrated Waste Management Board Solid Waste Characterization <http://www.ciwmb.ca.gov/WasteChar/>.



## LIGHT AND GLARE

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The impacts of introducing new light into the Presidio are analyzed on pages 248 and 249 of the PTMP EIS. The analysis indicates that building rehabilitation and new construction has the potential to increase light or glare in the Presidio, which would affect the character of the Presidio day and nighttime views. To prevent the loss of dark conditions and of natural night skies, the Trust would seek the cooperation of tenants to prevent or minimize the intrusion of artificial light. The Trust restricts the use of artificial lighting to those areas where security, basic human safety, and specific cultural resource requirements must be met. Where artificial lighting is required, minimal impact lighting techniques and shielding of artificial lighting would be used where necessary to prevent the disruption of the night sky, physiological processes of living organisms, and similar natural processes (Mitigation Measure NR-7 *Artificial Light*).

### SITE-SPECIFIC IMPACT ANALYSIS OF MAIN PARADE ALTERNATIVES:

**REHABILITATION ALTERNATIVE** *The proposed action would not perceptively increase light or glare.* Lights would be installed along the Anza Esplanade for orientation, wayfinding and public safety, and in the interpretive pavilions to foster night time use. In addition, feature lighting would be installed to illuminate the heritage trees, flagpoles and former powder magazine. Where applicable, lights would be high efficiency, low glare, full cut-off fixtures per the current California Title 24 code and LEED (Leadership in Energy and Environmental Design) guidelines for new lighting. The Main Parade would remain unlighted to preserve the historic context and the night-time view to the Bay.

**RESTORATION ALTERNATIVE** This alternative would maintain safe light levels while avoiding off-site lighting and night sky pollution. New lighting would be designed to save energy and minimize light trespass from the project site. The Main Parade would remain unlighted.

**NO ACTION ALTERNATIVE** This alternative would not impact the existing natural darkness of the Main Parade.

### CONSISTENCY WITH THE PTMP AND VMP

The Presidio Trust Management Plan (PTMP)<sup>35</sup> is the Trust's formally adopted policy statement for land use planning and related regulatory requirements for Area B of the Presidio. The PTMP provides general policies, concepts and guidelines to inform land use decisions. Any conflict between the project and policies that relate to physical environmental issues (such as increasing construction traffic or noise) are discussed above. The compatibility of the project with PTMP policies that do not relate to physical environmental issues will be considered by the Trust Board of Directors as part of their decision whether to approve or disapprove the project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the project.

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<sup>35</sup>The PTMP can be viewed at the Presidio Trust library, or on the Trust's website at <http://www.presidio.gov/Trust/Documents/ptmpsp.htm>.

The Vegetation Management Plan (VMP)<sup>36</sup> is the Trust's guide for the management of vegetation resources within Area B, including its native plant communities, historic forest and landscape vegetation. The VMP is incorporated by reference into the PTMP.

**REHABILITATION ALTERNATIVE** *The proposed action would not conflict with PTMP policies or VMP goals and strategies that relate to physical environmental issues.* Proposed improvements at the Main Parade would be consistent with the PTMP's vision to re-establish the historic parade ground. Landscape improvements proposed in this alternative would closely follow the "rehabilitation" preservation approach and treatment strategy articulated in the Secretary of the Interior's Standards and inferred in the PTMP.<sup>37</sup> According to the Secretary of the Interior's Standards, rehabilitation is defined as the need to alter or add to a cultural landscape to meet continuing or new uses while retaining the landscape's historic character. In keeping with this standard, the PTMP's rehabilitation treatment for the Main Parade emphasizes continuity while acknowledging change. It calls for the "greening" of the Main Parade to create a new focus for a variety of visitor activities, and transform the quality of the open space. The PTMP envisions this public open space as providing "a setting for ceremonies and celebrations that complement the surrounding historic buildings." As specified in the PTMP, the proposed action would reduce pavement, re-establish historic connections between buildings and the parade ground, and enhance physical and visual connections to Crissy Field.

The proposed 3,000 square feet of infill construction would represent approximately 2.7 percent of the permitted maximum new construction of 110,000 square feet under the PTMP. The proposed infill construction would be integrated into the Main Parade and carried out in accordance with PTMP guidelines for both spatial organization and land patterns and buildings and structures through:

- Selectively placing compatibly-scaled infill construction and/or landscape treatments to strengthen the articulation of the historic open space
- Orienting the new buildings or structures to reinforce the historic framework and layout of the Main Post
- Ensuring that the scale, massing, height, materials and color of the infill construction would be compatible with the character of adjacent buildings
- Limiting the maximum height to no more than 30-45 feet

In addition, proposed improvements at the Main Parade would adhere to open space/vegetation/views guidelines in the PTMP that promote:

- Retaining and enhancing historically significant open spaces, including the Main Parade
- Reinforcing their edges through new design features
- Commemorating and/or delineating the location of significant historic elements
- Improving pedestrian and visual connections

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<sup>36</sup>The VMP can be viewed at the Presidio Trust library, or on the Trust's website at <http://www.presidio.gov/trust/documents/environmentalplans/>.

<sup>37</sup>The PTMP also refers to "restoring", "preserving", and "rehabilitating" the Main Parade, thus using the Secretary of the Interior's terms for the treatments to cultural landscapes loosely and interchangeably.

- Maintaining small structures and symbolic objects
- Re-establishing historic views and visual connections

as well as guidelines for circulation and access that encourage:

- Simplifying the road network, clarifying the circulation system, and establishing a hierarchy of routes at the Main Post
- Removing or reducing the size of large surface parking lots, and locating smaller surface lots near buildings they serve
- Developing a pedestrian and bicycle path network and connecting key points within the Main Post

The Main Parade is designated as landscape vegetation on the VMP's vegetation management zoning map. The VMP notes that the Main Parade was a traditionally expansive open grassy area, but is now mostly paved. The proposed action would adhere to the VMP's recommended treatment for the Presidio's landscape vegetation, which is "rehabilitation."<sup>38</sup> The proposed action would also follow the VMP's guidance to:

- Maintain and enhance historic plantings and landscape character
- Use new plant materials that minimize threats to native plants from hybridization and invasive tendencies when replacement planting is necessary
- Initiate consultation to ensure compliance with Section 106 of the National Historic Preservation Act

**RESTORATION ALTERNATIVE** This alternative would be consistent with the PTMP's key concept of "greening" the Main Parade. It would also adhere to the PTMP's guidelines listed above. Site changes under this alternative would further the PTMP's objective to protect the integrity of the designed landscape area. Per the PTMP, new features and landscape elements, such as the interpretive building "footprints" along the Anza Esplanade, would be sited and designed to be compatible with the historic setting. As fewer visitor facilities would be provided compared to the proposed action, this alternative would fulfill to a lesser degree the PTMP's vision of the Main Parade as a suitable backdrop for visitor programs and a rich visitor experience.

According to the VMP, the proposed landscape treatment under this alternative (restoration rather than rehabilitation) would not be considered the most appropriate for the Main Parade's historic landscape resources. Nonetheless, the alternative would not conflict with VMP objectives for management of landscape vegetation.

**NO ACTION ALTERNATIVE** This alternative would not contribute to the PTMP's goal of greening the Main Parade or the VMP recommended treatment to rehabilitate the Presidio's designed landscape.

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<sup>38</sup> Similar to the Secretary of the Interior's definition, the VMP defines rehabilitation as the act or process of making possible a compatible use for a property through repair, alterations and additions while preserving those portions of features which convey its historical or cultural values (page 63).

## CUMULATIVE IMPACTS

### SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The cumulative impacts<sup>39</sup> of development on the Main Post and other districts within the Presidio are analyzed on pages 363 through 375 of the PTMP EIS. Table 60 on page 364 of the PTMP EIS, which provides the context for the discussion, enumerated 21 past, present and reasonably foreseeable actions, including projects by other agencies (NPS, USFWS, Golden Gate Bridge and the City and County of San Francisco Planning Department) that are specifically considered in the analysis (in addition to background growth). The identified actions were chosen based on their proximity to the Presidio, their potential influence on the same resources that could be affected by implementation of the PTMP (i.e., whether the effects of these actions would be similar to those of the project), and the likelihood of their occurrence. The actions were identified by consulting with various agencies within a project impact zone (which varied for each resource) and investigating their actions in the planning, budgeting, or execution phase. In some cases, cumulative effects were also compared to appropriate national, state, regional, or community goals to determine whether the total effect would be significant. In all but one of the 25 resource topics that are analyzed, the analysis in the PTMP EIS determines that cumulative impacts would not be significant and that the resources of concern would not be degraded to unacceptable levels. Cumulative air quality issues were found to be potentially significant due to contributions to regional growth (i.e., not due to localized air quality impacts). Development within the Main Post district would contribute to the referenced cumulative impacts. No mitigation measures for cumulative impacts have been previously identified.

### CONTRIBUTION OF REHABILITATION ALTERNATIVE TO CUMULATIVE IMPACTS:

**CUMULATIVE ACTIONS AND RESOURCES AFFECTED** *Overall, the incremental adverse effects associated with the proposed action are not expected to be significant. In several instances, the incremental contribution of the proposed action to the cumulative effect on the Main Post and Presidio would be neutral or beneficial.* Cumulative effects that have been described within the PTMP Final EIS are summarized below as they would pertain to other relevant cumulative actions that may have impacts in conjunction with the impacts of the proposed action. For the purposes of this discussion, these actions include the following:

- Rehabilitation and leasing of Buildings 5, 11-16, 35, 42, 56-59, 86, 87, 102, 106, and 211 (as tiered from the Trust's PTMP EIS, May 2002)
- Rehabilitation and new construction at Buildings 104, 122 and 108 (as analyzed in the Trust's Walt Disney Family Museum EA, August 2006)
- Rehabilitation and new construction at Building 100 (as analyzed in the Trust's International Center to End Violence EA, September 2007)
- Construction of the apparatus addition to Building 218 (as analyzed in the NPS' Presidio Fire Station Improvements EA, January 1997)

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<sup>39</sup>"Cumulative impact" is defined in CEQ's NEPA regulations as the "impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions ..." (40 CFR 1508.7).

- Construction of the transit center, Building 215 (as tiered from the Trust's PTMP EIS, May 2002)
- Construction on the Building 34 site for a 100-room lodging facility (to be analyzed in the Trust's PTMP Main Post Update Supplemental EIS, Late Spring 2008)
- Management of the El Presidio site (following most of the recommendations in the Trust's document entitled "Levantar")
- Restoration of the downstream portion of Tennessee Hollow (as analyzed in the Tennessee Hollow Upper Watershed Revitalization Project EA, August 2007)
- Reconstruction of Doyle Drive based on the likely preferred Presidio Parkway alternative (as analyzed in the Draft Environmental Impact/Report and Draft Section 4(f) Evaluation for Doyle Drive, South Access to the Golden Gate Bridge, December 2005)

And the following action, which was not contemplated in the PTMP Final EIS:

- Construction of a 100,000 square-foot contemporary art museum directly south of the Main Parade ground (to be analyzed in the Trust's PTMP Main Post Update Supplemental EIS, Late Spring 2008)

Specific resources that may be affected by these cumulative actions include the following: cultural resources; archaeological resources; visitor experience; visual resources; traffic, noise and parking.

**CULTURAL RESOURCES** *The cumulative actions of building rehabilitation, new construction and site changes at the Main Post that would protect the historic character and integrity of the National Historic Landmark District.*

*Establishing Cumulative Adverse Effect on the National Historic Landmark District.* One of the first requirements of the federal regulation (36 CFR 800 – Protection of Historic Properties) governing Section 106 of the National Historic Preservation Act (NHPA) is to determine and document the area of potential effect for each project or undertaking that a federal agency proposes. An area of potential effect includes both direct effects (e.g. construction disturbance or physical changes to character defining elements) and indirect effects (e.g., the introduction of new elements into an historic district). Multiple projects or undertakings occurring in the same planning area would have, at a minimum, overlapping areas of potential effect and more likely would have the same area of potential effect for all projects. Therefore, the entire Main Post is the area of potential effects for the projects or undertakings in this district. The responsibility of the Trust, then, under Section 106 would be to "take into account the effects of their undertakings on historic properties" for all projects in the area of potential effect. Further, because the Presidio is a National Historic Landmark, the Trust is required to "undertake such planning and actions as may be necessary to minimize harm to" the Landmark status.

In response to the NHPA requirements and to establish a threshold for minimizing harm to the Landmark, the Trust developed planning and guidance materials in several separate documents. The PTMP included management principles to "guide future actions and decisions" and ensure the long-term preservation of the Landmark District. The PTMP further included planning concepts and guidelines for all districts in the Presidio including the Main Post. Shortly after release of the PTMP, the Trust developed the Main Post cultural landscape assessment which both identified the historic sensitivities and provided treatment and planning

recommendations which, if followed, would ensure consistency and compatibility of new projects in the Main Post area. Most recently, the Trust has drafted the Main Post Planning and Design Guidelines which builds on the PTMP and the cultural landscape analysis. This last guidance document takes into account all projects occurring in the Main Post and establishes a baseline of guidance that, when followed, would ensure that the cumulative effect of all projects would minimize or avoid adverse effect to the Main Post and would not be adverse to the Landmark as a whole.

*Landscape Improvements Including the Proposed Action.* Improvements at the Main Parade ground would rehabilitate the existing 6.2-acre parking lot into the green open space 'heart' of the Main Post. Proposed improvements would recognize the historic military order in the landscape, and include opportunities for interpreting the Presidio's history. Existing landmarks and symbols would be incorporated, and important historic spatial and visual relationships would be reinforced, including the boundaries of the parade ground and the relationships between buildings and open spaces. Returning or reinforcing historic character defining elements that have been removed or have deteriorated through time would strengthen the association, setting, and feeling of the historic Main Post area. Though not currently listed as a contributing element to the NHL, actions proposed at Pershing Square would retain the integrity of the landscaper feature such that it could likely be listed as a contributing feature in the next update to the Landmark status. These improvements would, as well, ensure that this site would remain, as it was historically, an open ceremonial area that reinforces the association, setting and feeling of the Main Post. New elements associated with the Main Parade under the proposed action would be compatible with the NHL, and changes would seek to avoid or minimize adverse effects to historic resources.

Rehabilitation of landscapes associated with building rehabilitations and new construction would be accomplished in conformance with the recommendations of the draft Main Post Planning and Design Guidelines and the landscape treatments identified in the Main Post Cultural Landscape Assessment. Like the Main Parade ground improvements, rehabilitated landscapes would preserve remnant historic plantings while returning or reinforcing deteriorated or missing spatial and visual relationships throughout the Main Post. The result of controlled landscape improvements around building rehabilitations would be a strengthening of the association, setting, and feeling of the Main Post area. These improvements would avoid adverse effect to the Main Post under NHPA criteria and, further, would have an overall beneficial effect on the Main Post under the NEPA.

The area of potential effect established for the total Tennessee Hollow Watershed project overlaps the area of potential effect established for the proposed action. The Tennessee Hollow project is to be studied and implemented in an iterative manner over many years in multiple phases. So far one hydrologic connection and habitat restoration project has been implemented at Fill Site 6A north of Lincoln Avenue at Girard Avenue. Section 106 consultation on this project ended with concurrence among all PA parties on a finding of no adverse effect. Two more phases are being studied at this time: 1) the Quartermaster Reach Resource Enhancement project south of Mason Street; and 2) the Upper Watershed Revitalization Project at El Polin Spring. Restoration of the downstream portion of Tennessee Hollow has and would maintain important historic connections and relationships between other planning districts, reestablish or interpret missing historic features in the deteriorated historic landscape, preserve historic character defining elements, historic open spaces, and

entry sequences. Areas involved in the revitalization of the upper watershed are outside of the view shed of the Main Post area and are screened by historic forest stands. However, the project fully intends to retain and enhance historic features and road alignments and therefore is anticipated to retain the important association, setting, and feeling of this area of the NHL. The sum of all the projects either completed or anticipated along the Tennessee Valley Watershed would not have a cumulative adverse effect on the Main Post area or the NHL as a whole. In fact, the enhancement of historic forest stands, retention of historic circulations patterns, and revealing of missing or deteriorated historic elements is anticipated to have a beneficial effect on the NHL.

*Building Rehabilitation.* The proposed action would rehabilitate and adaptively use the Powder Magazine as an interpretive facility. The rehabilitation would have no adverse effect on the Powder Magazine and would provide a new use of a building was vacant long before the transfer of the Presidio from the Army.

Rehabilitation projects completed to date include three certified historic preservation tax incentive projects at buildings 35, 38, and 39. The Part 2 submission was recently certified for the building 100 rehabilitation for the Family Violence Prevention Fund. Within the view shed of the Main Post, the Tides Foundation in the Letterman Complex was the first certified rehabilitation project in the Presidio. By definition, all certified rehabilitations meet the Secretary of the Interior's Standards for Rehabilitation and therefore do not involve adverse effect.

Work is underway on the rehabilitation of Buildings 104, 108, and 122 as the Walt Disney Family Museum. This project was determined to have no adverse effect through review under the PA. Building 102 on Montgomery Street is scheduled for rehabilitation as the NPS' Visitor Center and is anticipated to have no adverse effect although funding has not yet been secured to complete this project. Buildings 86 and 87, the Civil War Barracks, and building 36, the former Military Police Headquarters, were rehabilitated by the Trust with a finding of no adverse effect for each. Building 210, the Guard House, was rehabilitated for use as a bank and the post office with a finding of no adverse effect. Half of the Funston Avenue housing units have been rehabilitated and the rehabilitation of the remaining half will be completed in the Spring of 2008; all with a finding of no adverse effect. The Trust anticipates finding funding or developers to rehabilitate the majority of the remaining buildings, including the Montgomery Street Barracks, within the next five years.

Rehabilitation of historic buildings would comply with the PTMP Planning Principles and Planning District Guidelines, and draft Main Post Planning and Design Guidelines. Building rehabilitation for compatible new uses would require minimal alteration of the character-defining materials, features, spaces and spatial relationships of the buildings and their settings. Rehabilitation may include construction of new additions (analysis below) to support proposed new use and would primarily house elements of the new use program that cannot be accommodated within the historic building without significant removal of historic fabric. The Trust would commit to future planning and environmental analysis for the proposed undertakings, and the requirement for further consultation under Section 106 of the National Historic Preservation Act. Reuse and rehabilitation of historic buildings in the Main Post would ensure the preservation of these resources as well as meet the NHPA mandate for preferential use of historic properties over new construction. Rehabilitation of these historic buildings would have a beneficial effect on the Main Post and the Landmark as a whole.

*New Construction.* New construction would be designed and sited to comply with the guidance in the draft Main Post Planning and Design Guidelines. New construction would include the courtyard infill additions between the “wings” of Buildings 100 and 104, small additions to existing buildings needed to make new program uses work (e.g. stairwells or elevators), three pavilions and a small café associated with the Anza Esplanade, the lodging facility on the Building 34 site, and the contemporary art museum adjacent to the south end of the Main Parade. New construction would be confined to existing or historic areas of development and designed and sited to minimize impacts on the association, setting, and feeling of the Main Post. Infill construction would be compatibly-scaled, and selectively placed and oriented to reinforce the historic framework and layout of the Main Post. In addition, the scale, massing, height, materials and color of infill construction would be compatible with the character of adjacent buildings or, in the case of the contemporary art museum, with the historic landscape. The Trust would continue to engage in public review before making any decision to proceed with construction of new buildings.

Previously completed new construction at the transit center (Building 215) and the fire house apparatus addition (Building 218), although constructed prior to the draft Main Post Planning and Design Guidelines, followed the same principles described in that document. Design guidance for the Building 218 addition came from a compatibility study prepared specifically for the project. This early study informed both the PTMP guidelines and the more recent draft Main Post Planning and Design Guidelines. Both projects were found to have no adverse effect in separate 106 consultations. By reinforcing the historic grid pattern of the Main Post, potential impacts from this new construction were minimized.

Construction of a new infill addition at the Building 104 courtyard was found to have no adverse effect through the Section 106 process. Recent certification of the Part 2 submission through the federal historic preservation tax incentives process for the proposed rehabilitation of Building 100 indicates conformance with the Secretary’s Standards for the new addition associated with this project. For the remainder of the Montgomery Street Barracks, the draft Main Post Planning and Design Guidelines state that new additions should be small and only as needed to make the new use work. These guidelines further state that rehabilitation needs of each building would be reviewed on a case by case basis. Following this guidance for the remainder of the Montgomery Street Barracks would minimize or avoid potential adverse effects to this entire cluster of historic resources, the Main Post as a whole, and on the Landmark as a whole.

*Demolition:* The Trust anticipates the demolition of historic buildings in the Main Post but not associated with the proposed action. Demolition of historic buildings would have an adverse effect on each historic resource involved but would be planned to minimize the adverse effect on the association, setting, and feeling of the Main Post as a district.

Under the PTMP cap, square footage for new construction proposed in the Main Post would be accommodated primarily from demolition of buildings associated with the Public Health Service Hospital rehabilitation and the Doyle Drive replacement projects. Separate section 106 consultations were completed or are underway for each of these projects to take into account the effects of demolition. The remaining square footage would be accommodated from demolition associated with the other Main Post projects described below.



Demolition of both historic and non-historic buildings is anticipated in association with the contemporary art museum, the lodge, enhancement of the El Presidio archaeological site, and to accommodate parking needs. The Trust also anticipates completing the demolition study required in the Presidio Trust Act within the next three years. However, it is not anticipated that this study would identify additional Main Post historic buildings for demolition beyond those cited above.

In fiscal year 2008, the Trust will contract for the update of the Presidio of San Francisco National Historic Landmark nomination form as the first step in the section 106 consultation for demolition. Since the existing form is now fifteen years old, the federal regulations governing section 106 require reevaluation of properties that have been previously determined to not be historic. As an example, Cold War era properties were not evaluated in the 1993 Presidio NHL update because they were not yet fifty years old. Since the preparation of that document Cold War era properties have been listed on the National Register of Historic Places in other areas of the country. Therefore, the update to the NHL will reevaluate properties from this era of history. Section 106 consultation for whichever projects include demolition would conclude with a Memorandum of Agreement.

*Doyle Drive.* Replacement of Doyle Drive would result in an adverse effect on the Presidio National Historic Landmark District by: 1) introducing new structural and visual elements (i.e., viaducts, tunnels and an at-grade parkway) that would not resemble the existing Doyle Drive facility in overall location, massing and scale; and 2) requiring the destruction of contributing elements, including Buildings 201, 204 and 230, and alteration of contributing roadways, including Young Street, Halleck Street, Gorgas Avenue, Girard Road and Vallejo Street. Appropriate measures negotiated among the cooperating agencies and finalized in a Memorandum of Agreement (MOA) would address impacts to resources potentially affected by the proposed project. The Built Environment Treatment Plan (BETP) required by the MOA would establish treatments for resources and landscape elements that remain following reconstruction of Doyle Drive as well as describe treatments for the replacement of historic buildings and features that would be removed to make room for the new parkway. Implementing treatments identified in the BETP would present opportunities to meet the cultural resource management goals for the Presidio NHL, including interpretation, treatment, preservation, rehabilitation and restoration, which would contribute to beneficial cumulative impacts.

**ARCHAEOLOGICAL RESOURCES** *Building demolition, new construction, infrastructure upgrades, pavement or vegetation removal, creek restoration, and roadway reconstruction in connection with the cumulative actions may adversely affect archaeological sites within the Main Post. However, guidelines in the PTMP and measures contained in the PA, PTMP EIS, and the Doyle Drive EIS would help avoid or mitigate most potential adverse effects.* An overarching research design will be prepared for the Main Post, which will include inventory level testing to inform decision making, and draft data recovery plans appropriate to the results of the testing. Strategies to avoid adverse effects to contributing sites will continue to be prioritized. Newly discovered archaeological sites will be evaluated for eligibility for listing in the National Register of Historic Places, either independently or as part of the NHL. If Native American human remains are encountered during the course of these projects, protocols will be followed to comply with the Native American Graves Protection and Repatriation Act (NAGPRA). All artifacts found would be cataloged, appropriately treated, and properly stored or displayed according to applicable federal standards.

Much of the AMS for El Presidio will be followed to protect and maintain El Presidio's integrity, increase public awareness of this archaeological resource, recover data of archaeological significance, represent archaeological features in the landscape, and provide for curation of archaeological collections and associated records. However, proposed traffic circulation at the Main Post under the cumulative actions is counter to the priority outlined in the AMS to "close one block of Graham Street to through traffic." The cumulative actions would most likely permanently close alternative vehicular routes, and direct existing and future traffic onto Graham Street within El Presidio, which would continue to diminish the character of this property. These alternative vehicular routes could otherwise be used to redirect traffic away from El Presidio, allowing the closure of Graham Street. Maintaining Graham Street as a major street through El Presidio would preclude unrestricted research at this façade of the earlier [circa 1792] portions of El Presidio, and severely limit capabilities to interpret this colonial period and represent archaeological features physically in the landscape. Partial and seasonal closures of Graham Street to facilitate excavations, commemorations and interpretation to enhance the character and experience of El Presidio as called for within this EA would reduce but not eliminate this cumulative effect. Cumulative actions would also result in increased pressure to maintain existing parking at El Presidio, which is contrary to a recommendation with the AMS.

**VISITOR EXPERIENCE** *In general, cumulative actions would add to the visitor experience offered at the Main Post, and would enhance its setting for the arts and for historical and cultural programs related to the Presidio.* The rehabilitated buildings host new park tenants and programs. Improvements to the Main Parade would rehabilitate the existing 6.2-acre parking lot as the green open space 'heart' of the Main Post to accommodate an array of new public uses, including historical re-enactments, performances, special events, and everyday activities. The transit center provides visitors with public restrooms, connections to public transit, and information about what to do in the park. The lodging facility at the Main Post would improve visitor services, provide an opportunity for overnight visitor accommodation and ancillary services, and help establish the district as a vibrant visitor destination. The contemporary art museum would allow museum goers to appreciate and understand history, culture and art of the 20th and 21st century. The Trust would place limits on visitor opportunities (PTMP Mitigation Measure CO-4), prohibit visitor uses (PTMP Mitigation Measure CO-5), impose management controls (PTMP Mitigation Measure CO 6), and monitor visitor levels to ensure that visitation levels would not exceed desired conditions, and that unacceptable impacts to park resources and visitor experiences, including those at the Main Parade, would not occur. Restoration of the downstream portion of Tennessee Hollow would provide trails, smaller pathways, seating, landscaped areas, and interpretive components, and provide recreational benefits of a more naturalized landscape (nature walks, birdwatching, ecological stewardship, photography, painting, etc.) to improve the visitor experience. Finally, reconstruction of Doyle Drive would provide a new compatibly-designed Presidio entrance (Girard Avenue) in the northeaster part of the Main Post to serve as the main vehicular entry for tenants and visitors to the district. However, during the Doyle Drive construction period, the visitor experience at the Main Post would be degraded as the normal scenic and tranquil setting would be disrupted by the sights and sounds of construction. Visitors would still have full access and use of the facilities within the district.

**VISUAL RESOURCES** *Under the cumulative actions, existing major view corridors afforded from the Main Parade and El Presidio would be maintained and protected.* Rehabilitation of the historic buildings would

create a positive visual change within the Main Post. New construction would be limited, but where allowed, it would be compatible with the visual setting. The lodge between Graham and Anza Streets would reestablish the visual separation that historically existed between the Main Parade and the Old Parade. Restoring the Main Parade and reinforcing the edges of the historic open space through new design features would complement the rehabilitated historic buildings and improve visual quality by reducing pavement and introducing grass and other compatible materials. Main Parade improvements would also anticipate opportunities to enhance physical and visual connections to Crissy Field when Doyle Drive is replaced. Restoration of Tennessee Hollow would improve the existing visual setting by expanding natural habitat areas and providing an important visual (and ecological) corridor, which would form a unique visual backdrop to the developed environment of the district. The realignment of Doyle Drive would generally improve views from the Main Post of the shoreline and bay by placing portions of the roadway at or below ground level and eliminating the visual and physical barrier created by the current elevated structure. However, Doyle Drive construction activities would require the presence of substantial amounts of equipment during this four- to five-year long process and would include grading, the removal of plants and trees, and demolition of existing structures, resulting in an adverse visual change.

**TRAFFIC** *Residents, visitors, and employees may experience temporary delays and other inconveniences (such as noise) associated with construction activities in connection with the cumulative actions, and would need to use other roadways in the Presidio to reach their destination.* The potential for increased delay and congestion would depend on the timing of construction activities associated with each project, and measures that would be implemented to eliminate or reduce potential impacts (such as, with Doyle Drive, public awareness campaigns and increased transit service). At a minimum, in each case, detour and/or other signs would be posted to inform drivers.

*Upon implementation of the cumulative actions, site improvements would improve circulation, creating distinctions between vehicular and pedestrian routes, and enhance connections to the surrounding buildings, the transit center, and the Presidio as a whole.* The transit center would provide safe and convenient access to transit and orientation information to visitors, and would include a waiting area and public restrooms. Road and intersection improvements would be made to minimize traffic congestion and enhance safety. Occupation of rehabilitated and newly-constructed buildings would contribute a small amount of traffic to the overall increase expected to be generated by the Presidio. In the PTMP EIS, proposed development throughout the Presidio was estimated to generate 44,407 daily one-way vehicle trips, and the Main Post was estimated to generate 11,860 of those trips. The preliminary information about the cumulative projects identified above suggest that, when combined with currently occupied buildings, the Main Post district would generate approximately 9,550 daily one-way vehicle trips. This is approximately 700 trips (or 8 percent) more than the number of trips associated with the land uses anticipated in PTMP for these same buildings and new construction. Approximately 100 of these additional 700 one-way vehicle trips would occur in the PM peak commute hour, and the number of AM peak hour trips would be slightly less than anticipated with PTMP. Compared to PTMP assumptions, the additional 100 PM peak hour vehicle trips would represent a 9 percent increase in PM peak hour traffic generated by Main Post uses and ultimately a 2 percent increase in future PM peak hour traffic generated throughout the Presidio. Because of the Main Post's central location in the Presidio, the additional 100 PM peak hour vehicle trips would immediately disperse to several different intersections. The intersections

in the Main Post that would be most affected by the additional traffic were forecast to operate at LOS D or better in the peak commute hours in the PTMP EIS. The operation of these intersections is not expected to be significantly affected by the additional trips generated by the cumulative projects identified above.

*The traffic increases resulting from the cumulative actions would adversely affect the operation of some intersections farther from the Main Post. However, mitigation measures adopted as part of the PTMP EIS would improve intersection operations to acceptable levels under cumulative conditions, except for the intersection of Lincoln/Bowley/Pershing, which is forecast to operate at an unacceptable level of service due to overall regional traffic growth.* Long term cumulative impacts associated with the new Doyle Drive were addressed in the PTMP EIS transportation analysis. Overall, the Doyle Drive project would result in a benefit or little change to long-term traffic conditions in the region.<sup>40</sup>

**NOISE** *Construction activities associated with the cumulative actions would temporarily increase noise within the Main Post.* This noise could be considered any annoyance by park users and building occupants within close proximity of the activity. There may be times when noise could interfere with indoor activities in nearby uses adjacent to project sites. Noise impacts could be intermittently disruptive or annoying to persons nearby, however, they would be temporary in nature and limited to the period of construction. All construction activities would be conducted in compliance with the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code), which prescribes working times, types of construction equipment to be used, and permissible noise emissions.

Various locations would experience increased noise from traffic generated by cumulative actions, including areas along Lincoln Boulevard, the San Francisco National Cemetery, and the residences along Riley Avenue nearest to Sheridan Avenue. While traffic volumes would increase noise above background levels, the increase would not be substantial (i.e., would not exceed applicable standards) and would not warrant mitigation (except the current practice of enforcing noise insulation requirements equivalent to the standards of Title 24 to provide an acceptable interior noise environment following building rehabilitation or new construction). The Trust would review final building plans to ensure that building wall, floor/ceiling assemblies, and windows meet the standards regarding sound transmission.

Reconstruction of Doyle Drive would result in potential construction noise impacts on the north end of the Main Post. Occurring over a construction period of multiple years, construction noise would be intermittent, and the level would vary depending on the type, location and length of the activity. Generally, noise would range from the mid- to upper-80s dBA at locations within 100 feet of the project construction limits. Construction equipment would operate in a limited area then move along the alignment until the completion of the project. Implementing the measures specified in the Doyle Drive EIS and the PTMP EIS would reduce negative noise effects. Doyle Drive is not expected to create any permanent noise impacts, as traffic noise would not differ noticeably from present conditions.

**PARKING** *The identified cumulative actions could result in unmet parking demand during the midday weekday period.* Improvements to the Main Parade ground would replace the central 740-space parking lot with smaller,

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<sup>40</sup> Cf., Draft Environmental Impact Statement/Report and Draft Section 4(f) Evaluation, South Access to the Golden Gate Bridge (Doyle Drive) prepared by the San Francisco County Transportation Authority, dated December 2005.

decentralized parking lots to better serve the Main Post. These decentralized lots would include expansions to existing lots, improving the efficiency of layouts in existing lots, and some new parking lots. Existing street parking would be preserved, and new street parking would be added. Nearly all of the existing district supply (excluding Infantry Terrace) of approximately 2,150 parking spaces would be relocated to simplify access and reduce their visual impacts. After the decentralized lots and added street parking is complete, approximately 2,055 parking spaces would remain in the Main Post (excluding Infantry Terrace). Some of these 2,055 spaces planned to be located on the sites of the proposed 100-room lodge and 100,000 square-foot contemporary art museum could potentially be displaced by these two projects. Preliminary information about the cumulative projects suggests that midday weekday parking demand in the Main Post would increase to approximately 2,150 parking spaces (excluding Infantry Terrace). This estimate assumes shared use of parking supply, parking management (including fees), and management of resources to accommodate special events. If parking spaces are not provided on the sites of these two cumulative projects, total parking demand in the district could exceed supply after parking spaces on the Main Parade are relocated to other locations within the district.

The availability of parking is not considered a permanent physical condition, as it is a condition that varies with demand. Therefore, parking supply is not considered a significant resource under NEPA. Parking deficits are not considered to be environmental impacts to the physical environment, but rather social effects. Although a parking deficit is not considered to be a direct environmental effect, there are possible secondary environmental effects associated with parking shortfalls. Motorists circulating to find parking spaces can contribute to increased traffic congestion at intersections, and associated air quality and noise impacts. These potential secondary effects are reasonably addressed in the air quality and noise sections of the PTMP EIS and this EA.

As required by Mitigation Measure *TR-22 TDM Program Monitoring*, the Trust would implement a Transportation Demand Management (TDM) program within the district to reduce automobile usage and associated parking demand by all tenants, occupants and visitors. The availability of alternative transportation modes and the Trust's TDM program provide mitigation measures for these potential secondary environmental effects. Constrained parking supply combined with TDM measures (e.g., downtown PresidiGo service) would minimize these secondary environmental effects associated with motorists circulating to find parking spaces since some motorists would choose to use other modes. The Trust would monitor implementation and effectiveness of the TDM program on an ongoing basis. If TDM goals are not being reached, the Trust would implement more aggressive strategies or intensify components of the existing program, such as requiring tenant participation in more TDM program elements, increasing parking fees, and providing more frequent and/or extensive shuttle service.

Reconstruction of Doyle Drive is expected to include an underground parking facility at the eastern end of the alignment between the Mason Street warehouses and the Gorgas Street warehouses. The parking garage would provide parking spaces to mitigate the parking impacts associated with the Doyle Drive project.

**CONTRIBUTION OF RESTORATION ALTERNATIVE TO CUMULATIVE IMPACTS:**

Overall, the incremental adverse effects associated with the other action alternative (i.e., the Restoration Alternative) would be similar to the proposed action and would not be significant. The incremental contribution of the action alternative to the cumulative effect on cultural resources, archaeological resources, and the visitor experience within the Main Post and Presidio would be less than the proposed action, as it would require fewer changes, additions and alterations.

## *4 Agencies and Persons Consulted*

The following agencies were consulted during preparation of the EA.

### **ADVISORY COUNCIL ON HISTORIC PRESERVATION / CALIFORNIA STATE HISTORIC PRESERVATION OFFICER / NATIONAL PARK SERVICE**

As described in the PTMP EIS (page 82), the Trust is required to comply with the National Historic Preservation Act (NHPA). Section 110 of the NHPA sets out the broad responsibilities of federal agencies to integrate preservation into their ongoing activities, and requires agencies to “minimize harm” to National Historic Landmarks like the Presidio. Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties, and to seek comments on their actions from an independent federal reviewing agency, the Advisory Council on Historic Preservation (ACHP). The ACHP’s regulations governing consultation under Section 106 further require the agency to consult with the applicable State Historic Preservation Officer and any other organizations or individuals who express an interest in being part of the Section 106 process.

During preparation of the PTMP, the Trust consulted with the ACHP, the California State Historic Preservation Officer (SHPO), and the NPS as well as with the National Trust for Historic Preservation (NTHP), and the Presidio Historical Association (PHA, formerly the Fort Point and Presidio Historical Association) as concurring parties and executed a Programmatic Agreement (PA) regarding the plan and various operation and maintenance activities within Area B of the Presidio. This PA establishes procedures by which the Trust will satisfy its Section 106 responsibilities.<sup>41</sup>

Section 106 consultation through the PA for the Main Parade project was initiated on March 24, 2005, with the submission of a consultation package to all PA parties. Consistent with the Stipulations of the PA, the Trust’s intention in submitting the consultation package early in the public scoping process was to integrate Section 106 with the NEPA process. Comments were received from the PHA on April 19, 2005. This organization requested that the Area of Potential Effect for the project be expanded “to reflect more accurately the project’s potential effects as well as the cumulative effects of the proposed project.” That same day a consultation meeting was held among the SHPO, NPS, and the Trust with ACHP declining participation in the meeting. As an outcome of the meeting, the Area of Potential Effect for the project was established including an expansion to accommodate the concerns of the PHA.

A public scoping meeting was held on May 18, 2005 at which members of the PHA provided comment. This organization later provided their comments in writing in a letter dated May 31, 2005. The organization stated that, “current designs have improved dramatically, and have come a long way towards being appropriate responses to this sensitive, historic heart of the Presidio.” The organization further stated that they “have remaining serious concerns about potential impacts, and about process.” They elaborated on their comments as including concerns over the cumulative effects, potential impact on future interpretation of El Presidio,

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<sup>41</sup> See PTMP EIS Appendix D for the full text of the agreement.

impacts to historic buildings as well as the historic district, and concerns on the effect that excavation might have on unknown archaeological sites.

The Trust accepted an NPS comment letter dated June 3, 2005 following the close of the public scoping comment period. The agency stated that “previous efforts to explore a broad range of revitalization alternatives prior to Public Scoping have yielded viable alternatives that are respectful of and compatible with the Main Parade’s status as a contributing element to the Presidio’s National Historic Landmark Status.” The NPS cautioned the Trust to “give first priority to the rehabilitation and reuse of historic structures before considering new infill construction.”

Over the course of the next two years as concepts and alternatives were developed, PA parties were briefed on project developments in a series of meetings with each of the individual parties. Update presentations were given to the SHPO, the NPS, the National Trust for Historic Preservation, and the PHA. During these meetings and, in fact, from their first involvement in the project, the PHA, in particular, encouraged the Trust to incorporate historical interpretation into the Main Parade project going so far as to suggest a “walk through time” as a major component to any improvements. As a result, the Trust proposed the Anza Esplanade as the interpretive backbone of the Main Post and initiated discussions with history organizations and individuals, including the NPS, National Trust for Historic Preservation, and the PHA, toward developing a coherent and lively interpretive program as a part of this feature. While discussions with all interested organizations on the interpretation content will continue well past the release of this EA, the effects of construction of the physical elements of the Anza interpretive walk have been analyzed in this document.

Further review of this EA and FONSI by PA parties will be as described in the stipulations of the PA. Upon receipt of this EA, parties will have thirty days to review and provide written comment to the Trust. The Trust’s response to these comments will also be governed by the stipulations of the PA. The Trust anticipates recording comments, responses, and any possible revisions as a result of those comments in the FONSI.



## 5 *Public Involvement*

The following describes the process used to invite the participation of the public prior to preparation of the EA.

### **PUBLIC MEETINGS PRIOR TO SCOPING**

In the two years prior to initiating formal public scoping period for the Main Parade project, the Trust conducted an extensive program of public workshops and contact with community groups and individuals aimed at fact finding and determining public interest in the possible rehabilitation of the Main Parade. Over the course of five workshops, the Trust engaged the interested public in reviewing and discussing planning, context, and treatment recommendations that could be incorporated into alternatives for the Main Parade project. The ultimate purpose of this pre-scoping engagement program was to develop the scope and substance of the Main Parade project.

The first workshop was held on January 13, 2004, and focused on the planning context for the project. Presentations reviewed the findings of the 2002 Main Post Cultural Landscape Assessment and relevant treatment recommendations. Also presented was a review of landscape treatments in “great parks” from around the world. The public was engaged in a discussion on the topics of interpretation, open space, and parking and circulation.

At a second workshop held on January 28, 2004, the Trust engaged the public in a discussion of the topics of edges and connections, history, and parking. Five objectives were proposed to be considered in working with the Main Parade area:

- 1 Consideration of civic space
- 2 Protection and interpretation of history
- 3 Issues of parking, circulation, and access
- 4 Connections between open spaces
- 5 Character desired for the Main Parade landscape

Workshops three and four held on March 30, 2004 and September 22, 2004, respectively, recapitulated the presentations from the previous two sessions and focused on possible rehabilitation treatments for the ground surface of the Main Parade. Much of these sessions discussed reestablishing the now missing historic eastern edge of the Main Parade. In addition, discussion included the possibility of incorporating an interpretive walk associated with the eastern edge at Anza Street. Also discussed were concerns for improving public circulation and continued concerns over parking.

The fifth and last workshop before initiating public scoping was held on October 25, 2004, and was intended to recap and refine the discussions of the previous four sessions. At the fifth session, discussion continued on treatment strategies for the ground surface of the Main Parade as well as the possibility of incorporating interpretation into any project for this site. Public feedback from this session reflected concerns that would later be raised during public scoping, many of which would be the focus of the environmental analysis. Issues that

were identified during this session included design considerations, public programming, possible new construction associated with the project, parking considerations, effects on scenic views, preservation of the historic setting, and historic interpretation were all raised during this session.

### SCOPING PROCESS AND ISSUES RAISED DURING SCOPING

The Trust formally initiated the scoping process for the EA by sending a notice to approximately 15,000 organizations and individuals on the Trust's mailing list in mid-March 2005. The notice announced the alternatives to be examined, invited the public to attend an upcoming public meeting, and requested comments regarding issues and environmental impacts for study and suggestions for the alternatives under consideration in the EA. The notice and an article on the project's status also appeared in the March/April 2005 issue of the Presidio Post, the Trust's now quarterly publication. The public meeting was held at the Presidio Officers' Club on May 18, 2005 and attended by 38 members of the public. By the close of the 75-day public scoping period for the project (March 18, 2005 - May 31, 2005), the Trust received 15 letters, including one from a public agency and neighborhood association, and two from historic preservation organizations.

#### PUBLIC AGENCIES, ORGANIZATIONS, AND INDIVIDUALS COMMENTING DURING SCOPING FOR THE MAIN PARADE ENVIRONMENTAL ASSESSMENT

PUBLIC AGENCIES:	United States Department of the Interior, National Park Service, Golden Gate National Recreation Area
NEIGHBORHOOD ORGANIZATIONS:	Neighborhood Associations for Presidio Planning (NAPP)
HISTORIC PRESERVATION ORGANIZATIONS:	California Heritage Council (CHC) Presidio Historical Association (PHA)
INDIVIDUALS:	Anonymous Bradford, Seth Don, Yvonne Green, Donald S. Hall, Whitney Hayward, Winchell T. Meyer, Amy Painter, Michael Ream, Nancy Waldman, Matthew & Tatiana Zegart, Margaret Kettunen

The following is a summary of the comment letters received with responses to the key issues raised.<sup>42</sup>

<sup>42</sup>Copies of the original letters are on file and available for public review at the Presidio Trust library.

#### MAIN POST THEME AND POTENTIAL USES:

**COMMENT** NAPP asserted that a plan for the Main Parade could not proceed without knowing what kinds of uses would surround the space, particularly those uses in the Montgomery Street barracks. Amy Meyer differed with this position. She acknowledged that the Trust “cannot wait indefinitely for just the right building tenants to come along and the nature of the Main Post tenants may not easily fit a central theme.” However, she lamented that the Main Post’s themes have not yet emerged. “I’ve heard they might be expressed, for example, with flags and a time line, but my heart and mind have not been touched.” She and the PHA requested that lobbies within buildings include exhibits that express important Presidio stories and its main themes. Margaret Kettunen Zegart submitted that the Main Parade’s historical concept as a “gathering place” is most important for future planning direction.

**RESPONSE** NAPP is referred to the PTMP, which provides that preferred land uses within the Main Post will include offices, cultural/educational uses, and housing complemented by small-scale lodging and conference space, recreation and some supporting retail services (page 62). Since the project primarily reestablishes the physical and psychological historic character of the Main Parade, actual use of the surrounding facilities, while possibly complementary to the purpose of reestablishing the Main Parade as the “heart of the Presidio,” is not directly associated with this preservation project. In other words, each has its own independent purpose and utility, and one does not compel the outcome of the other.

The interpretive walk proposed along Anza Street in the preferred alternative would provide a now non-existent nexus for interpretation in the Main Post as well as the Presidio. Lobby and building interpretation measures by tenants which are already a standard requirement of Presidio Trust building leases would complement and could be coordinated with the themes of the interpretive walk.

#### CURRENT USES:

**COMMENT** Yvonne Don and Matthew Waldman urged that the Main Parade should remain as an open space parking lot, and provided reasons to support their positions. These individuals typically argued that many current uses would be negatively affected, including close, centralized (and overflow) parking for special events. The NPS supported the Trust’s aims to incorporate as many public uses as possible.

**RESPONSE** The effects of keeping the Main Parade as a parking lot are analyzed in the No Action Alternative.

#### EL PRESIDIO:

**COMMENT** NAPP suggested that the historic El Presidio area of the Main Post should be incorporated into the Main Parade project as it would be affected by proposed new buildings, parking plans, and traffic patterns currently being considered.

**RESPONSE** As required by the PTMP, improvements to the Main Parade would be constructed in such a manner as to avoid impacts to the El Presidio site, and would take into consideration the recommendations adopted from the Archaeological Management Strategy (AMS) for this site. AMS “priority actions” applicable to the Main Parade project include closing one block of Graham Street to through traffic, selecting appropriate

landscape replacement plantings, and reducing parking at the El Presidio site. While effects to the El Presidio site due to the Main Parade project would be minimal, in response to the comment, the El Presidio and Main Parade interface (i.e., El Presidio's westernmost edge) is included in the interpretive plans for the proposed action. Also, due to its connection to the project, management of the El Presidio site is discussed under Cumulative Impacts in Section 3 of this EA.

#### DISTRICT LEVEL PLANNING:

**COMMENT** NAPP, CHC, PHA and several individuals believed that a district plan for the Main Post as committed to in the PTMP should be the framework within which planning for the Main Parade is accomplished.

**RESPONSE** The Trust has, in fact, already defined for the public the district wide-plan for the Main Post. For more than two years, the Trust deferred development projects in order to engage the public in the development of the Presidio Trust Management Plan, a comprehensive land use plan for Area B of the Presidio. The Trust adopted the PTMP in August 2002 and is moving forward with site-specific project proposals that have been governed and guided by the plan. The accompanying PTMP EIS evaluated the broad environmental impacts of the program-level plan, and analyzed for each planning district, including the Main Post, the parameters of expected development and open space resource-based actions. A key action envisioned by the PTMP and analyzed by the PTMP EIS entailed the "greening" of the Main Parade to create a new focus for a variety of visitor activities, and transform the quality of the open space.

The PTMP held open the possibility of further, more specific district level planning where appropriate, but did not "commit to" further district level planning. Specifically, the PTMP states:

*The nature of this Plan necessitates that more specific planning be undertaken in the future, and that further public input and environmental analysis be completed before many implementation decisions are made. [Footnote 3: Exceptions to this statement will generally involve... improvements that would clearly not have significant or adverse impacts on park resources and neighboring areas other than described in the EIS that accompanies this Plan.] (PTMP, page 128).*

The proposed improvements to the Main Parade is just such a project as is referred to as among the exceptions that may not involve extensive additional environmental analysis under NEPA, because the potential impacts of the project have been largely identified and evaluated, and mitigations have already been defined as part of the PTMP EIS, as demonstrated in this EA.

#### CUMULATIVE IMPACTS:

**COMMENT** PHA stated that cumulative effects of the project combined with other actions in the area should be identified and analyzed. The NPS asked that the proposed on-ramps and off-ramps to Doyle Drive onto Girard Road do not increase the volume of cut-through traffic through the area surrounding the Main Parade. Michael Painter observed that the project design "works well" with the Doyle Drive Parkway proposal.

**RESPONSE** The requested analysis is included in the EA. The analysis is based on and tiers from the framework provided in the PTMP EIS, and focuses on cumulative issues that are important to the Main Post,

specifically impacts on traffic, parking, views, historic buildings and cultural landscapes, archaeological resources and visitors. The analysis determined the overall, incremental effects associated with the project would neither be adverse under the NHPA nor significant under the NEPA, and in several instances, the contribution of the project to cumulative effects on the Main Post would be neutral or beneficial. See also the updated Response to Comment on Cumulative Impacts in Attachment 2.

The PTMP EIS assumed that the new Doyle Drive access would generate some pass-through traffic, however the San Francisco Travel Demand Model suggested that the primary pass-through route would be between the Presidio Boulevard gate and the Doyle Drive access point. The pass-through route that would affect the Main Post is between the Arguello gate and the Doyle Drive access point, which is not expected to have substantial pass-through traffic.

#### SIGNIFICANT IMPACTS:

**COMMENT** PHA asserted that because potential impacts on traffic and the historic district are “clearly significant,” an EIS is required.

**RESPONSE** These assertions are unsubstantiated and are not supported by the analysis in Section 3 of this EA. The analysis concluded that the Main Parade rehabilitation can be accomplished with no adverse effect to either the historic structures in the immediate area or to the National Historic Landmark as a whole, and that traffic and parking impacts would be *de minimis*. Therefore, on the basis of the EA, the Trust has determined not to prepare an EIS.

#### PARK-WIDE TRANSPORTATION PLAN AND PARKING MANAGEMENT:

**COMMENT** Donald Green asserted that “without presenting a documented analytical assessment of parking demand, supply, prices, incentives and disincentives throughout the Presidio, there is no way the public... can properly determine the number of spaces to be included in the Main Post parade ground area.” Otherwise “parking at the parade ground area is a pig in a poke.” He also asked whether parking fees were being considered in determining the supply of parking spaces at the Main Parade.

**RESPONSE** As described in the PTMP EIS, the short-term and long-term parking demand of the future Main Post are calculated by land use applying the standard methodology used by the CCSF Planning Department. The estimated future parking demand conservatively assumes a moderate but not aggressive level of TDM measures are in place, to ensure that parking demand is not underestimated. Based on the uses in the Main Post in 2006, the Trust found that the calculated parking demand in the Main Post based on building occupancy during the same time frame was slightly higher than the actual parking demand. The Trust will continue to monitor actual parking demand in the Main Post to ensure that the parking demand calculation methodology does not underestimate actual parking demand. Parking fees are currently planned to be set at the local market rate in order to ensure effectiveness of the TDM program.

#### PARKING IMPACTS:

**COMMENT** This issue was by far the most raised during scoping. PHA requested that the intended uses of the Montgomery Street barracks should be identified to assess current and projected parking demand, and that all replacement parking spaces should be clearly identified on a map. Yvonne Don asked whether the project would include satellite parking areas to meet tenant needs. On the same note, Amy Meyer suggested that suitable parking may be as far as Doyle Drive, so the area to be studied for the Main Parade should be extended to such outlying areas. Donald Green asked whether the project would include a central area for parking that will be served by shuttles from other areas in the park (as he suggests is stated in the PTMP). He inquired what are these areas, how many cars must be accommodated in the central area, and is the central area the Main Parade or elsewhere? The NPS requested that alternative ways of moving people to activities and events at the Main Parade should be explored to reduce the volume of parking in the area.

While Donald Green and others wanted the Trust to limit parking to the fewest possible, some, such as Matthew Waldman, a park resident and employee, suggested that there is already a parking shortage and wished “the largest, best and most centralized parking lot on the Presidio” be retained. He believed the number of cars would increase in the future.

**RESPONSE** The uses of the Montgomery Street barracks and all other buildings in the Main Post have been considered and are included in the estimated future district-wide parking demand for each alternative, as tiered from the PTMP EIS parking demand estimates. As more specific tenant information becomes available, the estimated demand for the specific use is checked for consistency with what was assumed in the PTMP EIS.

The location of parking spaces is shown in Figure 4. The parking shown is adequate to serve the various buildings of the Main Post and has been located to serve the demand of buildings in the immediate area of nearby buildings. The parking would be managed such that an appropriate number of spaces in the immediate proximity of buildings (e.g., on-street parking) would have time restrictions to retain use of these spaces for visitors. More distant spaces would be available for employees in the district. The Trust is actively involved in the Doyle Drive design process, in which the construction of a parking garage against the bluff at the north edge of the Main Post is being considered. If a garage at this location is feasible, this reservoir of parking would be located immediately north of the transit center, making it convenient for employees and visitors of buildings at the north end of the Main Post as well as people boarding a shuttle to access the rest of the park. The PresidiGo shuttle system is just one component of the Trust’s TDM program designed to encourage use of non-automobile modes and discourage single-occupant vehicle use. A complete description of the Trust’s TDM Program can be found in Appendix D of the PTMP. See also the updated Response to Comment on Parking in Attachment 2.

#### TRAFFIC IMPACTS:

**COMMENT** Amy Meyer requested that the EA include review of the roads that feed into the Main Parade and design alternatives considered at some distance from the area to discourage cars from heading there to the extent possible. Matthew Waldman believed that the elimination of the one-way Lincoln Blvd. westbound after Montgomery Street to the cemetery, will route all traffic traveling across the Presidio (from the City to the

Golden Gate Bridge) from the Gorgas, Marina, Lombard and Presidio gates and from lower Arguello Boulevard to Montgomery and Sheridan Streets bordering the Main Parade.

**RESPONSE** The decentralization of the parking from the Main Parade to smaller peripheral lots would intercept much of the traffic destined for the Main Post at varying distances from the Main Parade. Under both alternatives, Lincoln Boulevard is proposed to accommodate two-way traffic between Montgomery and Sheridan, with the roadway between Buildings 105 and 106 being reopened to eastbound traffic. This change to the circulation network would reduce the amount of traffic on the northern portion of Montgomery Street.

#### ECONOMIC IMPACTS:

**COMMENT** PHA asked what the economic impacts of proposed new construction would be on the feasibility of occupying vacant historic buildings in the project vicinity. They also wished to know the economic impact of construction and maintenance of the conversion of the hard-surface parade ground to a green open space on the ability of the Trust to fund historic programs at the Presidio.

**RESPONSE** The Presidio Trust anticipates a beneficial impact from new construction as it will further enliven and make the Main Post a more desirable location. New construction proposed in this plan is limited to interpretation shelters, a small café and visitor services such as public restrooms. The commenter is referred to Chapter 4 of the PTMP (Plan Implementation) for a complete discussion of the Trust's financial challenges. While the Trust acknowledges capital and operating costs associated with the project, and would take these into account as part of its annual budget and work programming process, there is no correlation between those costs and a diminution of other agency programs.

#### VISUAL IMPACTS:

**COMMENT** The NPS and several individuals asked that the EA evaluate potential sites for infill construction to determine their impact on views from a variety of viewpoints within the Presidio.

**RESPONSE** In the Presidio Trust Management Plan, the "Guidelines for Buildings and Structures" proposed new construction to reinforce the historic framework and layout of the Main Post. This action would have a beneficial effect on the cultural landscape by reinforcing the historic framework and layout of the Main Post. Limited construction associated with interpretation along the eastern edge of the Main Parade would reestablish the historic context and view corridors of the Main Post rather than impacting these important elements. For a further discussion, refer to Visual Resources in Section 3 of this EA.

#### WATER SUPPLY IMPACTS:

**COMMENT** The NPS asked that the EA evaluate irrigation requirements and the impact of irrigation runoff, including water-borne fertilizer, on Crissy Marsh.

**RESPONSE** The requested information is provided in the Water Resources impacts discussion in Section 3 of this EA. The Trust will follow methods as described in the Trust's Construction Standards for Landscaping and Irrigation Projects to minimize runoff of excess irrigation water into the stormwater conveyance system leading

to Crissy Marsh. In addition, the Trust's Roads and Grounds Integrated Pest Management Program would be implemented to minimize pesticide drift, runoff, and groundwater contamination. All herbicides and pesticides proposed for use would be rapidly biodegradable, approved in advance by the Trust IPM Coordinator, and applied according to manufacturer's label recommendations and in conformance to all applicable laws and regulations.

#### PROCESS FOR DECISION-MAKING:

**COMMENT** NAPP requested an outline of the process for decisions to be made regarding the leasing and construction of new buildings, parking structures, street realignment and other changes at the Main Post.

**RESPONSE** Figure 4.3 on pages 130 and 131 of the PTMP describes and illustrates the process anticipated for the identified activities. Note that parking structures are not being considered as part of the Main Parade project, and new building construction would be minimal.

#### SCOPING PROCESS:

**COMMENT** CHC and PHA contended that scoping announcements and the presentation of the two "predesigned" alternatives at the public meeting precluded meaningful public comment on potential project effects, or invitations to shape alternatives other than those presented.

**RESPONSE** The Trust strongly disagrees with this assertion. The Trust conducted multiple data gathering workshops in the two years prior to public scoping. Materials or concepts shown at the public scoping meeting were based on the findings of those early workshops and intended to encourage public comment. The commenters are reminded that the scoping meeting was the sixth public meeting, that alternatives were narrowed through the process, that public input offered at the meeting had much merit and was incorporated into the project. Indeed, many of the comments made at the meeting focused not only on ways of improving the alternatives from a project design standpoint, but on the impacts of the project, primarily those on parking, circulation, and the cultural landscape. All of these issues are discussed in Section 3 of this EA. Comments made at the meeting and reflected in comment letters suggest that "they like where the alternatives are headed" and the alternatives were once again revised based on the comments. By the PHA's own admission, "in contrast to the initial concept drawings, the current designs have improved dramatically, and have come a long way towards being appropriate responses to this sensitive, historic heart of the Presidio." The Trust is indebted to extended public input for many of these improvements which could only have occurred through an open public process. The NPS noted that the "two alternatives presented at Public Scoping on May 23, 2005 have yielded viable alternatives that are respectful of and compatible with the parade ground's status as a contributing element to the Presidio's National Historic Landmark status."

#### NEW CONSTRUCTION:

**COMMENT** CHC opposed the construction of new buildings on the Main Parade, particularly a new building at the head of the parade ground which they offered "will dramatically change the historic appearance of the area, and will likely interrupt the view from the historic El Presidio site to the Bay." While this sentiment was echoed



by others, such as Whitney Hall, it was not unanimous. Amy Meyer suggested new construction was a “good idea” if it were to house something that advanced major themes and uses of the Main Parade. Michael Painter strongly supported the value of the addition of two carefully placed buildings, “which establishes the necessary architectural parameters for this large central open space.” One anonymous commenter suggested that new buildings would only be appropriate after 10 years when the Main Parade “has evolved and defined itself.” The NPS encouraged the Trust to give first priority to the rehabilitation and reuse of historic structures before considering new construction. The NPS stated that the building proposed at the south end of the Main Parade is not anticipated in the PTMP and may conflict with the historic “head” of all three parade grounds which is the Presidio Officers’ Club.

**RESPONSE** Under either the historic preservation treatments of rehabilitation or restoration, recovery of missing historic character is recommended. Even with an overlay of asphalt, the major character defining features of the Main Parade remain intact with the exception of the now missing eastern edge that was originally defined by multiple buildings. Both action alternatives evaluated in this EA propose reestablishing the eastern boundary of the parade ground. New construction envisioned in the proposed action is composed of support shelters along the interpretive walk and visitor services, and a small café.

#### TERRACING:

**COMMENT** CHC and Winchell Hayward opposed any terracing as they felt it would not permit original historic uses or a re-creation of those uses on the site. The NPS encouraged that terraces be designed to accommodate the possibility of historic reenactments on the Main Parade. Others appreciated the terrace/seating concept.

**RESPONSE** Of the two action alternatives, only the proposed action proposes terracing in the upper or southern ten percent of the overall length of the Main Parade. The proposed terracing would be of minimal rise per each step and would retain the overall important historic character of the continuous sloping parade ground. As evaluated in the discussion of Cultural Resources in Section 3, the proposed steps or terracing at the south end of the Main Parade would have no adverse effect on either this historic landscape element or on the Presidio as a whole.

#### PROMENADE:

**COMMENT** Whitney Hall and others suggested that the proposed promenade should be along Montgomery Street.

**RESPONSE** The suggestion to use the Montgomery Street sidewalk as the interpretive walk has been given serious consideration. The Trust believes that this suggestion has definite merit in bringing visitors closer to the historic barracks buildings and to the future visitor center. However, using Anza Street for this purpose aligns the interpretive walk with the Presidio Officers’ Club and the archaeological remains of the original Spanish Presidio, as well as a more central location between all of the historic parade grounds. In addition, the Trust anticipates introducing a considerable amount of interpretive elements along the walk that would be invasive if placed directly adjacent to the historic barracks buildings. The sidewalk along Montgomery Street

will remain an excellent historic connection between the barracks buildings and provide access to the visitor center. However, without the introduction of interpretive features, the Trust believes that this sidewalk will provide a much more contemplative experience that is consistent with its historic use.

#### RECREATIONAL USES:

**COMMENT** Seth Bradford requested that the project provide opportunities for rollerblading. Winchell Hayward and others felt that ballfields would be inappropriate.

**RESPONSE** Neither of the action alternatives precludes rollerblading as a recreational activity. While formal ball fields would be inappropriate to the historic scene, informal use of the Main Parade for recreational activities would be consistent with its historic use and even be desirable.

#### DESIGN FEATURES:

**COMMENT** Many, including the NPS, suggested the use of trees along Montgomery Street and elsewhere for climate control, reducing the scale of the place, defining edges, and making the Main Parade more inviting. Others wished to see flags along the proposed esplanade portraying the history of the Presidio.

**RESPONSE** Trees would be incorporated into the historic landscape under either action alternative as consistent with the treatment recommendations of the Main Post Cultural Landscape Assessment and Treatment Recommendations. Trees located along the interpretive walk as envisioned in the proposed action would help define outdoor spaces, the walk itself, and the eastern edge of the Main Parade. In either action alternative, flags would be incorporated into the use of the landscape consistent with the historic Army use for events and celebrations.

## *Finding of No Significant Impact*

This finding of no significant impact (FONSI) provides the basis for the Presidio Trust's (Trust) determination that proposed rehabilitation of the Main Parade, as analyzed in the attached environmental assessment (EA), will not have a significant effect on the human environment and does not require the preparation of an environmental impact statement (EIS). A description of the proposed action and its environmental consequences are contained in the EA, which is incorporated by reference into this FONSI.

### **PROPOSED ACTION**

The Main Parade is the 6.2-acre sloping surface parking lot and adjacent areas bounded by Montgomery, Lincoln, Graham, and Sheridan Streets in the historic Main Post district of the Presidio. "Greening" the Main Parade was identified as an important objective in the Presidio Trust Management Plan (PTMP), and will result in one of the most noticeable visual changes likely to occur during the Presidio's transformation from military post to park. The proposed action will rehabilitate the Main Parade to reinforce the Main Post as the heart of the Presidio and as the center of a new community and national park site. The proposed action will include the following major design elements: the Main Parade, the Anza Esplanade, Pershing Square, limited infill construction and building rehabilitation, vehicular and pedestrian circulation, parking, and green design. Following implementation, the proposed action will:

- Establish the Main Parade as the Presidio's central gathering place, improving both its appearance and accessibility
- Recognize the historic military order in the landscape, and include opportunities for interpreting the Presidio's history
- Incorporate existing landmarks and symbols such as the Centennial and Bicentennial trees, former powder magazine, and flagpole
- Reinforce important historic spatial and visual relationships, including the boundaries of the parade grounds and the relationships between buildings and open spaces
- Create a vibrant open space by reducing pavement and introducing grass and other compatible materials that complement adjacent structures and express an aesthetic appropriate to a national park site
- Provide venues for programs of various types and sizes, and increase opportunities for planned and unplanned gatherings
- Include outdoor space for performances and festivals, as well as for small-scale gatherings and daily activities such as picnicking, staging for tours, and other visitor experiences
- Improve circulation, creating distinctions between vehicular and pedestrian routes, and improving connections to the surrounding buildings, the transit center, and the Presidio as a whole
- Anticipate opportunities to enhance physical and visual connections to Crissy Field when Doyle Drive is replaced
- Include sufficient parking at locations appropriate to serve existing and planned land uses

## **BASIS FOR DECISION**

Based upon the EA, the Trust determines that the proposed action will not have direct, indirect or cumulative significant impacts on the human environment. The analysis supporting this conclusion is presented in Section 3 (Environmental Impact of the Proposed Action and Alternatives) of the EA. The following summarizes factors considered in this determination.

**ARCHAEOLOGICAL RESOURCES** The proposed action will not affect any known or previously identified archaeological properties in an unanticipated manner. Guidelines in the PTMP, measures contained in the Programmatic Agreement (PA), and conformance with recommendations within the Archaeological Management Strategy (AMS) for the El Presidio site will serve as the basis for developing one overarching research design for the Main Post district followed by site-specific testing and/or data recovery plans to locate and record significant features or sites in an effort to avoid adverse affects to these resources and incorporate significant properties in the overall design.

**CULTURAL RESOURCES** The proposed action will have a beneficial effect on the cultural landscape of the Main Post. Missing or altered historic character defining features will be reestablished by removing about 8.5 acres of asphalt pavement (net following construction) and recreating the eastern edge of the Main Parade. Introduction of the Anza Esplanade will provide the means of helping visitors better understand the developmental history of the area and establish linkages to other interpretation opportunities throughout the Presidio. The new construction associated with the Anza Esplanade will be appropriate and compatible with the Main Post's historic character. Through the application of PTMP planning principles and guidelines for the Main Post, the site-specific draft Main Post Planning and Design Guidelines, and Section 106 consultation as described in the PA (including consultation regarding site-specific design guidelines), the Trust will ensure that changes to the Presidio's historic landscape will be conducted in a manner that ensures the integrity of the landmark district.

**PARKING** The number of district parking spaces will remain approximately the same as it is today. Parking for an estimated 2,150 cars will be maintained in new parking lots to adequately accommodate expected demand. The parking lots will be carefully situated and designed to have minimal or no impacts on natural and cultural resources.

**CIRCULATION** The proposed action will not substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians or bicyclists. Redundant streets will be removed, the hierarchy of remaining Main Post streets will be clarified, and key points will be connected within and outside the Main Post. The change in the geometry of affected intersections, the additional project-related traffic, and the relocated parking on the Main Parade will not cause the operation of any nearby intersections to deteriorate to an unacceptable level.

**VISUAL RESOURCES** The proposed action will have a beneficial effect on views of the Main Parade due to the landscape and design improvements to the project site. Removal of asphalt pavement will greatly reduce the visual presence of parking and roads and will have a positive effect on the visual unity of the Main Post. Developing the Anza Esplanade and providing new facilities, such as picnic areas, walkways, interpretive areas, site design detailing and landscaping will substantially enhance the visual character of and viewing opportunities within the parade ground for visitors and tenants.

**VISITOR EXPERIENCE, INTERPRETATION AND RECREATION** The proposed action is not expected to adversely impact current or planned visitor services or recreation facilities. Rehabilitation of the Main Parade will improve visitor and interpretive opportunities by creating an experience more connected with and unique to the park; providing a pedestrian-focused site design, including a promenade, viewing plazas, and removal of the large parking lot that currently detracts from the visitor experience.

**HAZARDOUS MATERIALS** The proposed action will not pose an unacceptable present or potential hazard to human health or the environment, as the Main Parade area is not expected to contain notable quantities of hazardous substances or petroleum products. Actions will be taken as part of site rehabilitation to ensure that any encountered petroleum soil is disposed of and petroleum contamination is handled in accordance with applicable Trust plans and procedures to minimize risk to park visitors, workers and the environment.

**GEOLOGY AND SOILS** The proposed action will not increase the threat to public health and safety due to seismic hazards. Potential damage to structures from geologic hazards on the project site will be ameliorated through the Trust requirement for site-specific geotechnical reports and review of building permit applications. The Trust will approve the plans only when the nature and severity of the seismic hazards at the site have been evaluated and appropriate mitigation measures have been proposed.

**BIOLOGICAL RESOURCES** The proposed action will not have a measurable adverse effect on any riparian habitat or other sensitive natural community. The project site is in a developed area and does not support or provide habitat for any threatened or endangered species. The proposed action will not interfere with any native resident or migratory species. Furthermore, the site is not located within or near any riparian habitat, sensitive natural community, or federally protected wetlands.

**WATER RESOURCES** The proposed action will not substantially exceed the capacity of existing or planned stormwater drainage system, increase runoff, erosion or flooding on- or off-site, degrade surface or ground water quality, or violate any water quality standards or waste discharge requirements. Rather, pervious areas will increase from 9.2 to 16.7 acres, and decrease impervious areas from 13.8 to 6.3 acres within the affected watershed subbasins. Water needed to irrigate the parade ground is taken into account in the Presidio's water demand calculations. Irrigation demand will be reduced by implementing the various BMPs and irrigation standards described in the EA, and by using recycled wastewater when available.

**AIR QUALITY** The proposed action will not substantially increase vehicle emissions or emissions of other air pollutants, or generate significant nuisance dust or odors. Rather, removal of the 6.2-acre parking lot will eliminate an "urban heat island" that currently contributes to ozone (smog) formation. Feasible control measures for dust and construction emissions will be implemented to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces.

**NOISE** The proposed action will not expose persons to or generate noise levels in excess of applicable standards. Trust-enforced noise standards that specify conditions, working times, types of construction equipment to be used, and permissible noise levels will be applied to minimize noise disturbance in the vicinity of the work site during the construction process.

**SOLID WASTE** The proposed action will not substantially increase the amount of material that enters the commercial/industrial waste stream. Rather, approximately 20,000 tons of asphalt pavement will be recycled

and diverted from regional landfills. The reclaimed materials will be crushed and used as an aggregate source for roadways and parking lots within and outside the Presidio.

**LIGHT AND GLARE** The proposed action will not perceptively increase light or glare. Where applicable, lights will be high efficiency, low glare, full cut-off fixtures per the current California Title 24 code and LEED (Leadership in Energy and Environmental Design) guidelines for new lighting. The parade ground will remain unlighted to preserve the historic context and the night-time view to the Bay.

**CUMULATIVE IMPACTS** The incremental adverse effects associated with the proposed action on cultural resources, archaeological resources, and traffic are not expected to be significant. The incremental contribution of the proposed action to the cumulative effect on visitor experience; visual resources; and parking within the Main Post will be neutral or beneficial.

### **REASONS FOR REJECTION OF ALTERNATIVES**

The Trust has considered the following factors in choosing not to select the alternatives to the proposed action.

**RESTORATION ALTERNATIVE** This alternative was rejected because, while it would involve less intervention and would presumably be less expensive than the proposed action, and would have no significant environmental impacts, it would not respond to the contemporary uses and needs envisioned for the Main Post as set forth in the PTMP and the EA.

**NO ACTION** This alternative was rejected because it would not be compatible with the Main Parade's historic character and historic use, nor would it ensure the proper retention, care, and repair of the Main Parade, its inherent features, and its existing resources. The alternative would fail to educate visitors about the parade ground's historic themes, associations and lost character-defining features.

### **MEASURES TO AVOID OR MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS**

All relevant, reasonable means identified in the PTMP EIS and the Main Parade EA to alleviate the environmental impacts that could result from the proposed action will be implemented. These measures will be monitored and enforced in accordance with the monitoring and enforcement programs (MEPs) provided in the PTMP EIS Record of Decision and in Attachment 1. The Trust's Compliance Manager is responsible for monitoring compliance with the MEPs.

### **COMMENTS ON THE ENVIRONMENTAL ASSESSMENT**

During or shortly after the 60-day review period for the EA that ended September 7, 2007, the Trust received 6 letters, including those from the National Park Service (NPS), the National Trust for Historic Preservation (National Trust), the Neighborhood Association for Presidio Planning (NAPP), the Presidio Historical Association (PHA), and Stanford University, Department of Anthropology (Dr. Barbara Voss).<sup>1</sup> The Presidio Trust fully assessed all issues raised by the comments received during the review period and has provided a summary of and responses to these comments in Attachment 2. The letters identified "deficiencies" in the EA analyses, primarily with regard to cumulative impacts and the impact of the proposed action on the El Presidio

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<sup>1</sup> These letters are available for public review at the Presidio Trust Library, 34 Graham Street.

archaeological site. In response to the comments, the Trust revised its analyses, provided supporting data, and made factual corrections to improve the accuracy of the document. These text changes appear in the attached revised EA as noted in the comment responses. The comments received and the text changes in response do not give rise to new issues or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts that would warrant the Trust to modify the proposed action or to reconsider the conclusions reached in Section 3 of the EA.

## **FINDING**

The Trust has considered the information and analyses in the environmental assessment and supporting environmental documentation, the comments of agencies and the public, and the project's administrative record. Based on Trust regulations on environmental quality (36 CFR 1010), monitoring and experience, including prior significance determinations documented in previous NEPA decisions, it is the determination of the Trust that the proposed action is not a major federal action having the potential to significantly affect the quality of the human environment. There are no significant adverse effects on public health or safety, properties listed on the National Register of Historic Places, wetlands, endangered or threatened species, or other unique characteristics of park lands. No activities implementing the proposed action will involve resource effects warranting mitigations beyond those that are routinely adopted as conditions of Trust approvals for comparable projects. Implementation of the proposed action will not involve unique or unknown risks, have highly controversial environmental effects, cause loss or destruction of significant park resources, or violate any federal, state, or local law imposed for protection of the environment. Implementation of the proposed action is not precedent-setting nor will it automatically trigger other actions which may require environmental impact statements. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared.

## **RECOMMENDED:**

[Signed by John Pelka on 11/01/07]

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John Pelka  
Compliance Manager, Presidio Trust

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Date

## **APPROVED:**

[Signed by Craig Middleton on 11/01/07]

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Craig Middleton  
Executive Director, Presidio Trust

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Date

**ATTACHMENT 1  
MITIGATION MONITORING AND ENFORCEMENT PROGRAM**

MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<b>CULTURAL RESOURCES:</b>				
<b>COMPLIANCE WITH STANDARDS FOR CULTURAL LANDSCAPE REHABILITATION</b> Historic landscape rehabilitation shall conform to the Secretary of the Interior’s Guidelines for the Treatment of Cultural Landscapes, the treatment recommendation of the 2002 Cultural Landscape Assessment for the Main Post, and the guidance on landscape rehabilitation, new construction, and site improvements in the draft Main Post Planning & Design Guidelines.	Prior to Historic Landscape Rehabilitation	Presidio Trust FPO in Coordination with Project Historical Architect	Presidio Trust Preservation and Maintenance Program and Grounds Maintenance Program	Require through Design and Construction Documents and Document in the Project’s Administrative Record and Annual Report per PA
<b>ARCHAEOLOGICAL RESOURCES:</b>				
<b>EL PRESIDIO ARCHAEOLOGICAL MANAGEMENT PLAN</b> The treatment of archaeological properties shall be consistent with the majority of recommendations in the El Presidio Archaeological Management Strategy (AMS). However, since the AMS is a program and preservation oriented document, the Trust shall develop an overarching research design for the Main Post district followed by site-specific testing and/or recovery plans to locate and record significant features or sites in an effort to avoid adverse affects. Construction drawings shall not be prepared until the research design and testing program is completed and features, if any, are located. Because Graham Street will not be closed as recommended in the AMS, the Trust shall ensure temporary closures of Graham, including seasonally, to facilitate excavations, commemorations, and interpretation as recommended in the AMS.	Continual	Presidio Trust FPO and Historical Archaeologist (for archaeological discoveries)	Presidio Trust Preservation and Maintenance Program	Incorporate Measure into Research Design and Testing and Recovery Plans and Document in Annual Report per PA
<b>TRAFFIC AND PARKING:</b>				
<b>CONSTRUCTION TRAFFIC MANAGEMENT</b> The construction contractor shall develop a Construction Traffic Management Plan prior to construction to provide specific routes and other measures to reduce potential conflicts with local and regional traffic, especially from the larger construction vehicles.	Prior to Construction Activities	Project Construction Contractor in Coordination with Presidio Trust Project Manager	Construction Traffic Management Plan	Require as Condition for Construction Permit

Note: These mitigation measures were established in the Main Parade Environmental Assessment (EA) or during its review and will be adopted and implemented by the Trust as part of the decision. Refer to Section 3 (Environmental Impact of the Proposed Action and Alternatives) of the EA for a background discussion of the mitigation measures.



**ATTACHMENT 1  
MITIGATION MONITORING AND ENFORCEMENT PROGRAM**

<b>MITIGATION MEASURE</b>	<b>REPORTING STAGE</b>	<b>RESPONSIBILITY FOR COMPLIANCE</b>	<b>METHOD OF IMPLEMENTATION</b>	<b>ENFORCEMENT</b>
<b>VISITOR EXPERIENCE, INTERPRETATION AND RECREATION:</b>				
<b>MANAGEMENT CONTROLS</b> The Trust shall manage public use at the Main Parade, and if necessary, make adjustments to the way activities are conducted, and monitor for and address unacceptable impacts to park resources and visitor experiences.	As Warranted	Presidio Trust Environmental Protection Specialist	Presidio Trust NEPA Compliance Process	Document in Project's Administrative Record
<b>HAZARDOUS MATERIALS:</b>				
<b>CONTAMINATED SOILS</b> In accordance with the Trust's Low Temperature Thermally Treated (LTTD) Soil Tracking and Management Plan, LTTD soil encountered within or adjacent to the Main Parade shall be segregated from other soils, removed, and disposed off-site at a Trust-approved, licensed landfill. Similarly, if petroleum contamination is encountered in the project area, it shall be handled in accordance with the Petroleum Contingency Plan. Any other contaminated soils shall also be appropriately disposed off-site.	Prior to Historic Landscape Rehabilitation	Project Construction Contractor in Coordination with Presidio Trust Environmental Remediation Manager	LTTD Soil Tracking and Management Plan and Petroleum Contingency Plan	Require as Condition for Construction Permit
<b>BIOLOGICAL RESOURCES:</b>				
<b>NESTING BIRDS</b> The Trust shall cut or prune vegetation within the project site only outside of bird nesting season (currently March 1 to August 15) unless Trust monitoring indicates nesting birds are not present	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record
<b>TREE PRESERVATION</b> The heritage trees situated on the project site shall be fenced during construction and protection measures in the Trust's Tree Preservation Specifications shall be followed in order to minimize effects to the tree root systems as much as possible.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Forestry Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record
<b>CONTROL OF INVASIVE SPECIES</b> When selecting plants for landscaping, the Trust shall avoid plant species that can escape landscaped areas and invade native plant communities and other areas. The Trust's lists of approved and prohibited plant material for consideration in designed landscapes shall be reviewed in plant selection. Plants that may be considered for planting and not found on the lists shall be evaluated by qualified Trust staff specialists to determine their degree of invasiveness, and whether they can be successfully controllable to limit substantial impacts on park resources.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record

**ATTACHMENT 1  
MITIGATION MONITORING AND ENFORCEMENT PROGRAM**

MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<b>WATER RESOURCES:</b>				
<b>STORMWATER POLLUTION PREVENTION</b> The project civil engineer shall develop a Stormwater Pollution Prevention Plan (SWPPP) that provides for temporary measures to control sediment and other pollutants during construction.	During Project Planning and Design	Presidio Trust Engineering/Utilities Manager and Natural Resources Program Manager in Coordination with Project Civil Engineer	Presidio Trust NEPA Compliance Process	Incorporate Measures into SWPPP and Project Plans and Document in Project's Administrative Record
<b>STORMWATER CONTROL</b> The project civil engineer shall develop a Stormwater Control Plan to minimize site imperviousness, control pollutant sources, and incorporate treatment and flow-control facilities that retain, detain, or treat runoff. The Stormwater Control Plan shall meet the criteria in the most recent version of the C.3 Stormwater Handbook as referenced by the Bay Area Stormwater Management Agencies and Associations.	During Project Planning and Design	Presidio Trust Engineering/Utilities Manager and Natural Resources Program Manager in Coordination with Project Civil Engineer	Presidio Trust NEPA Compliance Process	Incorporate Conceptual Plan and Drainage Measures into Stormwater Control Plan and Document in Project's Administrative Record
<b>AIR QUALITY:</b>				
<b>DUST EMISSIONS</b> The construction contractor shall implement feasible Bay Area Air Quality Management District (BAAQMD) control measures for dust emissions as appropriate to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. Basic control measures are as follows:  1 Water all active construction areas at least twice daily 2 Cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least two feet of freeboard 3 Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas 4 Sweep when necessary (with water sweepers) all paved access roads, parking areas, and staging areas 5 Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Project Construction Contractor	Presidio Trust NEPA Compliance Process	Require as Condition for Construction Permit

**ATTACHMENT 1  
MITIGATION MONITORING AND ENFORCEMENT PROGRAM**

MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<p><b>CONSTRUCTION EQUIPMENT EXHAUST EMISSIONS</b> The construction contractor shall implement U.S. Environmental Protection Agency recommendations to reduce construction equipment exhaust emissions. Measures are as follows: all construction equipment used at the construction site shall:</p> <ol style="list-style-type: none"> <li>1 Not idle for more than ten minutes</li> <li>2 Not be altered to increase engine horsepower</li> <li>3 Be newer and cleaner (1996 or newer)</li> <li>4 Be staged away from sensitive receptors (Buildings 386 and 387) as well as away from fresh air intakes to buildings and air conditioners</li> <li>5 Include particulate traps, oxidation catalysts and other suitable control devices</li> <li>6 Use ultra low sulfur diesel fuel with a sulfur content of 15 parts per million or less or other suitable alternative diesel fuel, unless the fuel cannot be reasonably procured in the geographic area</li> <li>7 Be tuned to the engine manufacturer’s specifications in accordance with a defined maintenance schedule</li> </ol>	<p>During Project Planning and Construction Activities</p>	<p>Presidio Trust Project Manager in Coordination with Project Construction Contractor</p>	<p>Presidio Trust NEPA Compliance Process</p>	<p>Require as Condition for Construction Permit</p>
<b>NOISE:</b>				
<p><b>CONSTRUCTION NOISE</b> The construction contractor and other equipment operators shall comply with Trust-enforced noise criteria, standards and levels set forth in the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) to minimize noise disturbance in the vicinity of the project site during the construction process.</p>	<p>During Project Planning and Construction Activities</p>	<p>Presidio Trust Project Manager in Coordination with Project Construction Contractor</p>	<p>Presidio Trust NEPA Compliance Process</p>	<p>Require as Condition for Construction Permit</p>
<b>LIGHT AND GLARE:</b>				
<p><b>ARTIFICIAL LIGHTING</b> The Trust shall restrict the use of artificial lighting to those areas where security, basic human safety, and specific visual needs must be met. Where applicable, lights shall be high efficiency, low glare, full cut-off fixtures per the current California Title 24 code and LEED (Leadership in Energy and Environmental Design) guidelines for new lighting. The Main Parade shall remain unlighted to preserve the historic context and the night-time view to the Bay.</p>	<p>During Project Planning and Design</p>	<p>Project Architectural Lighting Consultant in Coordination with Presidio Trust Architect</p>	<p>Presidio Trust Design Review Process</p>	<p>Document in the Project’s Administrative Record</p>

**ATTACHMENT 2  
RESPONSE TO COMMENTS**

<b>COMMENT</b>	<b>RESPONSE</b>
<b>TRUST REQUIREMENTS:</b>	
<p>The Presidio Historical Association (PHA) believes that the Trust “is legally charged by Congress with the duty of maintaining and fostering historic values for the benefit of the nation” and all proposals must be viewed in this context.</p>	<p>The Trust does not share the PHA’s belief that the Presidio should be preserved as a historical abstraction, but rather, as a place preserved through active reuse. It is more accurate to say that the Trust’s “charge” is the one that was directed by Congress and which appears on the inside cover of the Main Parade EA: to preserve the Presidio as a park for the American public. The Trust gives preference to proposals that serve the public interest. The PHA is referred to the selection criteria provided on page 134 of the PTMP for further information on this topic.</p>
<b>DISTRICT LEVEL PLANNING:</b>	
<p>The PHA states there should be Main Post district planning “as promised” during preparation of the PTMP. The Neighborhood Associations for Presidio Planning (NAPP) asks the Trust to “present the Main Post and the Main Parade... as a visual and useful whole.”</p>	<p>The PTMP does not commit to district-level planning and states “...It is impossible to know the precise nature of public involvement that would be appropriate or required for any specific project... The actual process would vary depending upon the magnitude and potential effects of the proposal” (page 130). Refer also to page 128 of the PTMP, which states “while it is difficult to predict with any certainty the precise scope or content of future planning efforts, and therefore the appropriate vehicle for public input and analysis, it is possible to articulate some broad guidelines.” Those guidelines, provided on page 130 and 131 of the PTMP, include seeking public input in conformance with the NEPA and NHPA, which was done with this proposed action. See also the Response to Comment on District Level Planning in Section 5 (Public Involvement) of the Main Parade EA. For a comprehensive view of the Main Post and Main Parade, refer to pages 62 through 69 of the PTMP.</p>
<b>CUMULATIVE IMPACTS:</b>	
<p>The NPS asked that the Main Parade EA be amended or revised to include a comprehensive cumulative impact assessment that addresses all ongoing and future development projects on the Main Post. The PHA asserted that the EA should mention the suitability of other Presidio districts where lodging has been planned or designated in the past. “There is no discussion of cumulative impacts of the hotel or of any of the other currently planned Presidio projects within or proximate to the Historic District.” The historic preservation association argued that when viewed with “other related and dependent plans,” the proposed action has a significant environmental impact. NAPP believed the EA is deficient because it “only deals with the Main Parade rather than also including those known, proposed and contemplated projects in the vicinity.” The National Trust for Historic Preservation (National Trust) noted that the EA does not consider the additional cumulative impacts resulting from the proposed Presidio Museum. For these reasons, the PHA, NAPP and the National Trust felt that an EIS is required.</p>	<p>The commenters are referred to the Cumulative Impacts discussion in Section 3 of the attached EA, which evaluates the cumulative impacts of “construction of the Building 34 site for a 100-room lodging facility” and 14 additional projects on or nearby the Main Post in conjunction with the impacts of the proposed action. The projects are a subset of past, present and reasonably foreseeable actions previously identified and evaluated in the PTMP EIS that could have effects similar to those of the proposed action, with the notable exception of the contemporary art museum, which was speculative at the time of release of the Main Parade EA and therefore did not require further evaluation. However, in response to the comment and to new information sufficient to evaluate impacts, the cumulative analysis in the attached EA has been revised to include the museum project. Both the PTMP EIS and the updated Main Parade EA analyses demonstrate that the Main Parade project in combination with the other identified projects will have at most a neutral effect to historic structures in the immediate area and to the National Historic Landmark as a whole, and that the project’s impacts to traffic and parking will be <i>de minimis</i>. Other resources of concern will not be degraded to unacceptable levels. No mitigation measures for cumulative impacts have been identified or found necessary. Because cumulative impacts within the Main Post district have been</p>

**ATTACHMENT 2  
RESPONSE TO COMMENTS**

<b>COMMENT</b>	<b>RESPONSE</b>
	fully evaluated in the PTMP EIS and again reviewed in the current context of the Main Parade in the attached EA, no additional analysis is necessary, and no EIS is warranted.
The National Trust noted that the PTMP allows for a net increase of 90,000 square feet in the Main Post planning district and asked: "It appears that something approaching 200,000 square feet of new construction is currently proposed for the district, which begs the question, where are the 100,000 square feet of existing structures that would be demolished?"	Square footage from demolition of buildings associated with the Public Health Service Hospital rehabilitation and the Doyle Drive replacement projects will fully accommodate the needs of the new construction associated with the Main Parade and will be the primary source of square footage for other new construction proposed in the Main Post. Impacts of building demolition for the Doyle Drive and PSHH projects have been analyzed in separate NEPA and NHPA processes. Should additional demolition in the Main Post area be required to accommodate future new construction, the additional square footage needed and associated impacts of building demolition will be analyzed in subsequent NEPA and NHPA documents.
<b>SEGMENTATION AND PIECEMEALING:</b>	
The PHA and NAPP accused the Trust of segmentation and "piecemealing" under the NEPA. "A project sponsor cannot partition a project, or fail to describe the impacts on interdependent and related projects which have reached the level of maturity of those involving the parade ground and the historic district." And: "Please take the time to present the Main Post and Main Parade... as a visual and useful whole and not piecemeal." Both groups believed that the projects currently under consideration at the Main Post should be reviewed in one document.	<p>Segmentation or piecemealing under NEPA is the concept that where actions are "substantially related to one another," they cannot be considered in separate environmental impact statements if the purpose is to subvert NEPA's purposes. The common example is a highway planned to connect two cities, which the federal highway agency separates into two segments, knowing that the second segment passes through sensitive wilderness area. If the first impact statement has no adverse environmental consequences and the first highway segment is built, then the agency has committed itself to a continuation of the highway through the wilderness area without having considered the adverse impacts from the second segment. In this instance, the group of connected actions should be evaluated in the same NEPA document. Under NEPA, actions are connected if they are closely related and if they:</p> <ul style="list-style-type: none"> <li>• Automatically trigger other actions that may require environmental review</li> <li>• Cannot or will not proceed unless other actions are taken previously or simultaneously</li> <li>• Are interdependent parts of a larger action and depend on the larger action for their justification (40 CFR 1508.25(a)(1))</li> </ul> <p>None of the situations apply at the Main Post. The proposed rehabilitation of the Main Parade to accommodate an array of new public uses is not dependent upon other projects, uses, or leases within the Main Post district, nor does it compel the outcome of other projects within the Main Post. Likewise, building rehabilitation and new construction projects (such as the proposed lodge and museum) have their own independent purpose and utility. Their proximity alone does not under NEPA make them closely related or a single course of action, and therefore it is appropriate to treat them in separate documents. Nonetheless, while the Trust does not consider projects under consideration at the Main Post as connected actions, they are cumulative actions. As defined, the Main Parade EA identifies these actions, describes how they relate to the proposed action, discusses their impacts to the extent they are known, and explains when and in what type of NEPA document the actions have been or will be evaluated (see Response to Comment on Cumulative Impacts above).</p>

**ATTACHMENT 2  
RESPONSE TO COMMENTS**

<b>COMMENT</b>	<b>RESPONSE</b>
<b>PREFERENCE FOR REHABILITATION ALTERNATIVE:</b>	
The NAPP believed the Rehabilitation Alternative “shows greater promise” over the other two alternatives, but is concerned about the new infill construction west of Buildings 86 and 87.	The small café and public restroom are proposed on the approximate location of building that existed during a portion of the period of significance. This location was chosen to be in keeping with the rehabilitation alternative’s purpose of reestablishing the eastern edge of the Main Parade through representing locations of previous construction. The new building would be designed to comply with the draft Main Post Planning and Design Guidelines and, further, would be a maximum of one-story tall in order to remain consistent with the now demolished historic building. Meeting these parameters, the effect of the new building would not be adverse on the historic scene.
<b>CULTURAL RESOURCES:</b>	
The NPS was concerned that closing, widening and resurfacing Anza Street to create a pedestrian esplanade would introduce a “conspicuous new feature” that is “foreign” to the site.	The proposed pedestrian walkway will not be wider than Anza Street, which it is proposed to replace. The pedestrian walkway will retain the alignment and relative width of Anza Street within the historic landscape. Therefore, this element is neither conspicuous nor foreign to the landscape. The Trust’s historic preservation staff will be consulted regarding choice of color, texture, and materials that are compatible with both the replaced feature and the historic landscape. The Trust finds that the proposed street to walkway replacement will have no adverse effect on the association, setting, and feeling of the Main Parade or of the Main Post in general.
The NPS was concerned that the introduction of circulation across the Main Parade interrupts its continuous long sloping expanse, which is a character defining feature. The NPS also noted that the introduction of several rows of stepped stone outdoor seating at the southern end of the parade ground also intrudes on the spatial expanse and definition of the site.	Historic photographs show that all parade grounds in the Main Post were interrupted by pedestrian circulation patterns which by the time of the photographs had become obvious dedicated routes of travel. The Trust does not find the cross paths proposed for the Main Parade to be anomalous with historic use. However, Trust historic preservation staff will work with project designers and landscape architects to reduce the impact of these elements within the landscape by minimizing the interruption to the continuous parade ground slope and through the choice of materials, textures and colors. While the Trust does not find the stepped stone seating at the southern end to present an adverse effect, its historic preservation staff will coordinate with project designers regarding the size, scale, elevation change, breadth, material choice, and color of the seating elements.
The NAPP felt the El Presidio archaeological site is “shabbily treated” in the EA and asked what is its final treatment. “The most significant site in the Presidio is an afterthought or forgotten.”	The EA refers to El Presidio as the “single most important archaeological site in the park.” As noted in the EA, this important resource will be managed following the treatment and interpretation recommendations in the El Presidio Archaeological Management Strategy (AMS), or “Levantar”. The AMS calls for protecting and maintaining the site, increasing public awareness of the resource, recovering data of archaeological significance, and providing for curation of archaeological collections and associated records. A draft copy of the AMS is on file and available for public review in the Presidio Trust library. Direct effects to El Presidio are mostly beneficial and include landscape designs and interpretation that will be informed and developed over time based on research based excavations of the Western façade of El Presidio. This area is incorporated into the Pershing Square portion of the proposed Anza Esplanade. These effects will increase visibility of this unique resource

**ATTACHMENT 2  
RESPONSE TO COMMENTS**

<b>COMMENT</b>	<b>RESPONSE</b>
	<p>and establish a more worthwhile visitor experience at this significant site. Less direct impacts, such as continuing traffic on Graham Street, do contradict priorities laid out in the AMS. The Trust 's forthcoming research design for the Main Post district followed by site-specific testing and/or data recovery plans to locate and record significant features would avoid adverse affects to these resources and incorporate significant properties in the overall design.</p>
<p>Barbara Voss and Rob Edwards were concerned that the cumulative impact of projects being planned for the Main Post, including the Main Parade, Presidio Museum and Presidio Lodge, on the El Presidio site have not been considered. The archaeologists noted that both the Main Parade and the Presidio Lodge encroach on the physical site of El Presidio. "These individual losses of the site area together have the cumulative impact of eroding the areas of the site that are available for research, education, and public interpretation." They also noted that all three projects will increase visitor attendance at the Main Post, require modifications to current parking plans, and change traffic circulation in the Main Post. They felt the "biggest problem" is that major decisions are being made about traffic and parking in the Main Post through these individual projects without considering the current and future needs of the El Presidio site. "The decisions being made today about the Main Parade, the Lodge, and the Public Museum are all foreclosing future management options for the El Presidio site." Dr. Voss cautioned: "Don't foreclose this incredible opportunity by making decisions today that will irrevocably restrict future opportunities to develop the El Presidio archaeological site for the public good."</p>	<p>The cumulative impact of the combined Main Post projects is addressed in the "Cumulative Actions and Resources Affected" section of the attached Main Parade EA. There, the Trust acknowledges that the various components of the Main Post projects could adversely affect archaeological resources, including the El Presidio site. It goes on to state, however, that the Trust will be developing one research design for the Main Post district followed by site specific testing and/or data recovery plans to locate and record significant features or sites (see the response to comment directly above). The Archaeological Management Strategy (AMS) for the historic El Presidio site will be followed to protect and maintain the site, increase public awareness of this archaeological resource, recover data of archaeological significance, and provide for curation of archaeological collections and associated records." The Trust recognizes that the current draft version of the AMS does not adequately address the level of archaeological activity that these projects will require. Therefore, El Presidio will be explicitly addressed as an undertaking in any forthcoming review of cumulative projects at the Main Post, including the current and future needs of El Presidio.</p>
<p>Dr. Voss and Mr. Edwards were concerned that the EA contains "factual errors" about the El Presidio site, which may have led to "faulty assessments" of how the proposed action and alternatives may affect archaeological resources. They asserted the EA errors in defining the physical area of the El Presidio site, and presents an oversimplified and inaccurate image of the site. "To our best current knowledge, the El Presidio main quadrangle consisted of at least three successive builds. The architectural history of the El Presidio main quadrangle is complex and insufficient research has been conducted to date to support the reconstruction proposed for the Pershing Square component of the Main Parade project. The Presidio Trust should be prepared to conduct a substantial excavation and research program prior to any reconstruction of El Presidio in Pershing Square."</p>	<p>The Trust agrees with the archaeologists' assertion that the Main Parade EA oversimplifies the boundaries of the physical site of El Presidio, and that the monitoring program suggested by the EA should be bolstered. In order to address these issues, graphics and text have been updated to better reflect boundaries of the site to extent that they can be <i>known</i> from the available evidence. Furthermore, the Trust will be developing one research design for the Main Post District followed by site specific testing and/or data recovery plans to locate and record significant features or sites in an effort to avoid adverse affects to these resources and incorporate significant properties in the overall design. No construction work will go forward until such work is completed, and future project planning will include a full program of archaeological fieldwork and documentation. Implementing a representative landscape for El Presidio at Pershing Square will follow the progress of archaeological excavations and the design and interpretation will be informed and developed based on research based excavations undertaken over time. This approach is consistent with the direction of the AMS, with added priority for research at this Western façade, and will be consistent with that described in the PTMP, which states that the restoration of the Main Parade will take place in such a manner as to avoid impacts to the El Presidio site, and in compliance with recommendations adopted from the AMS for the site (PTMP page 216).</p> <p>Dr. Voss is correct in noting that the 1962 NHL designation was based on the Spanish colonial-era El Presidio de San Francisco site, rather than "military architecture dating from the 1860s to the Cold War era," as stated in the EA. Indeed, the Presidio of San Francisco was designated a National Historic Landmark in 1962, "primarily as a significant Spanish colonial military settlement," and new</p>

**ATTACHMENT 2  
RESPONSE TO COMMENTS**

<b>COMMENT</b>	<b>RESPONSE</b>
	<p>text has been inserted to clarify this important distinction. However, it was “secondarily recognized for its long military occupation by the US since 1846 (Presidio of San Francisco National Register of Historic Places Registration Forms, October 1993, page 7-6).”</p>
<p>Dr. Voss and Mr. Edwards expressed concern about the long-term effects of traffic and parking decisions on the El Presidio site. “The proposed action includes parking and traffic components that will severely foreclose management, research, and public interpretation options for the El Presidio archaeological site.” Dr. Voss specifically asked whether parking would remain available within the current footprint of the El Presidio site, and whether Graham Street and Moraga Street would stay open to vehicular traffic. If so, she noted that both decisions would conflict with the recommendations of the draft AMP for the site. She inquired: “Can the Main Post accommodate the elimination of automobile traffic and parking within both the Main Parade and the El Presidio archaeological site?”</p>	<p>Concerns about cumulative impacts related to traffic and parking are also addressed in the revised Cumulative Actions and Resources Affected section of the attached EA. The Trust proposes to relocate parking from the centralized Main Post to smaller, decentralized parking lots, and notes that mitigation measure TR-22 (TDM Measurement) of the PTMP EIS will apply to ongoing parking plans. As for parking on the El Presidio site, the Trust intends to follow guidance offered by the AMS which states that existing parking will be reduced “over time as site investigation proceeds.” The Trust reiterates its goal to gradually remove all parking from the El Presidio site. The relocation of parking from the Main Parade to smaller decentralized lots does not necessarily preclude the subsequent relocation of parking away from El Presidio as envisioned in the AMS. The relocation of parking away from El Presidio would be beneficial to the long-term management, research, and public interpretation goals for the site.</p> <p>Dr. Voss also points out a discrepancy between the draft AMS and the Main Parade EA in the documents’ discussion of treatment plans for Graham Street. The Trust recognizes that the Main Parade EA highlights Graham Street as the primary north/south arterial “spine” roadway through the Main Post while the draft AMS calls for closure of “one block of Graham Street [within the El Presidio footprint] to traffic.” There is a contradiction between the proposed action and recommendations in the AMS. The Trust will close Graham Street for periods of time, including seasonally, to facilitate excavations, commemorations, and interpretation that would otherwise be prevented by through traffic. These issues of parking and traffic will be further analyzed in subsequent environmental review of foreseeable actions at the Main Post.</p>
<p>Dr. Voss noted that the Main Parade refers decisions about the management of the El Presidio site to Levantar, which is still in draft form. “It is insufficient for the EA to delegate management decisions to a document that has not been completed or formally adopted by the Presidio Trust.” She is concerned that the project would preclude implementation of the draft AMP.</p>	<p>The AMS was developed as a strategy for El Presidio with specific emphasis on preservation and programs, with recommendations for treatment. Because it was not a planning document, Dr. Voss’s comment that it was not subject to public comment is valid. However, the Trust disagrees that this strategy ‘has not yet been subject to agency, peer review.’ This strategy was circulated to the parties of the Trust Programmatic Agreement, including SHPO and ACHP as well as partners at California State Parks and U.C. Berkeley. As noted above, the Trust will be developing one research design for the Main Post district followed by site specific testing and/or data recovery plans to locate and record significant features or sites in an effort to avoid adverse affects to these resources and incorporate significant properties in the overall design. The actions proposed for Pershing Square align well with the goal laid out in the AMS to “create a compelling destination for visitors to learn about archaeology and commemorate the cornerstone of this park – El Presidio.” Furthermore the Trust will be explicitly looking at the treatment of El Presidio in upcoming NEPA documents for the Main Post. In doing so, it will address traffic circulation and describe expanded archaeological excavation and research plans for the ongoing program as well as the proposed museum and lodge locations.</p>



**ATTACHMENT 2  
RESPONSE TO COMMENTS**

<b>COMMENT</b>	<b>RESPONSE</b>
<p>The NPS believed the EA did not adequately articulate the goals of the AMP and did not provide enough information about the resources and impacts to Pershing Square, including the age of Pershing Square and its resources, and whether they are contributing features of the NHL district and how these features would be treated.</p>	<p><b>ARCHAEOLOGY</b> The attached EA has been updated to better articulate the goals of the AMS including the contradiction between the proposed action and the AMS with regard to Graham Street. The 1993 landmark documentation for archaeology at Pershing Square lists only predicted archaeological features that nonetheless contribute to the landmark. While the Trust has undertaken research based excavation at several other locations at El Presidio (Chapel Site, Funston Avenue) that have verified the significance and integrity of those portions of the archaeological site, no detailed research has been undertaken along Pershing Square. The Trust accepts that there are features with significance and integrity at Pershing Square that contribute to the landmark. Therefore, the proposed action will be undertaken in a manner that will be informed and developed based on research based excavation undertaken over time at Pershing Square, as called for in the AMS.</p> <p><b>CULTURAL LANDSCAPE</b> Pershing Square is not listed as a contributing feature in the 1993 NHL Update. However, because the land area bordered by Moraga, Graham, Sheridan, and Arguello was commemorated as Pershing Square after the tragic 1915 fire in which General Pershing's family died, it is likely that this feature will be determined to contribute in the next NHL Update scheduled to be completed in Fiscal Year 2008. This information was taken into account in the assessment of effects included in the attached EA. In order to provide clarity, Section 3 (Environmental Impact of the Proposed Action and Alternatives) has been updated to describe the age of Pershing Square, its significance, and the age of its current associated features. The assessment of effects in Section 3 has also been expanded to provide a better description of the effects of the proposed changes but the finding of effect has not changed. The Trust finds that the proposed action will have no adverse effect on the historic (or potentially eligible) features of this area.</p>
<p><b>PARKING:</b></p>	
<p>The NAPP said parking is a "major concern." "Removing about one third of the existing parking could be a serious problem." The neighborhood association requested more information for predicting parking impacts and need.</p>	<p>The Trust's methodology for estimating parking demand is described in further detail in the PTMP EIS and its Background Transportation Report. Since the publication of the PTMP, the parking analysis presented in the PTMP EIS has been updated with each new tenant in the Main Post. The parking demand is estimated for each new tenant and confirmed to be consistent with the assumptions and projected demand in the PTMP EIS. In recent years, Trust staff have also confirmed that the overall actual parking occupancy in the Main Post is consistent with demand estimates. The Trust will continue to monitor parking occupancy in the Main Post to confirm that estimates and assumptions reflect actual conditions.</p> <p>As now described in the discussion of cumulative parking effects, the identified cumulative projects could result in unmet parking demand during the midday weekday period. If parking is not made available on the lots shown in Figure 4, total parking demand in the district could exceed supply, and result in unmet parking demand during the midday weekday period. Although a parking deficit is not considered to be a direct environmental effect, there are possible secondary environmental effects associated with parking shortfalls. Motorists circulating to find parking spaces can contribute to</p>

**ATTACHMENT 2  
RESPONSE TO COMMENTS**

<b>COMMENT</b>	<b>RESPONSE</b>
	increased traffic congestion at intersections, and associated air quality and noise impacts. Constrained parking supply, the availability of alternative transportation modes and the Trust's TDM program provide mitigation measures for these potential secondary environmental effects.
The National Trust noted that new street parking would be added within the Main Post, but the EA does not identify where ("and the map does not distinguish between new and existing parking"), making it difficult to assess the impact on the historic setting.	As shown in Figure 4, the centralized 740-space parking lot would be replaced with smaller, decentralized parking lots, including expansions to existing lots, improvements to the efficiency of layouts in existing lots, and the addition of some new parking lots. Specific changes to existing parking lots and new parking lots will be subject to further NEPA and NHPA review.
<b>STORMWATER DETENTION:</b>	
The National Trust noted that the EA calls for "green design" incorporating a stormwater infiltration basin, but the location of this basin is not identified. They asked: "How does this interface with Doyle Drive design, and have archeological impacts been explored?" The NPS asked that the final design of the stormwater system includes a monitoring program.	<p>Since the release of the EA, the Trust has continued to explore a number of potential strategies and techniques to manage stormwater runoff from the site, with the goal of conforming to the C.3 Stormwater Handbook as referenced by the Bay Area Stormwater Management Agencies and Associations (BASMAA). The C.3 Stormwater Handbook, which was updated in May 2006, includes two site design goals in Section I.1: a) minimize impervious areas and b) provide stormwater treatment measures. The text in Section 2 of the EA (Green Design) had been revised to reflect this change. Should the stormwater infiltration basin be implemented, it will be designed in accordance with the C.3 Handbook requirements for minimum vertical separation from bottom of infiltration basin to the seasonal high water. The vertical clearance is required to allow for proper filtering of contaminants prior to storm water entering the groundwater. Geotechnical reports would be prepared to determine groundwater levels and soil permeability. In addition, a groundwater hydrological report may be deemed appropriate based on the findings from the geotechnical report, to determine any impacts to the groundwater system. The project final design would conform to the "Design Checklist for Infiltration Basins" in the C.3 Handbook. The design checklist includes requirements for: clearances to drinking water, set backs from structures, hydrologic soil classifications, underdrains, and observations wells. Consistent with the C.3 Handbook, the stormwater system would be documented, inspected and maintained through an operation and maintenance verification program. Monitoring would be conducted through one or more observation wells.</p> <p>The final design of the stormwater system will be reviewed by a Trust archaeologist, and archaeological monitoring may be required in accordance with Stipulation XII (Archaeology) of the Trust's PA. The basin is highly unlikely to conflict with the Doyle Drive design due to the sandy soils and the need for the Doyle Drive tunnels to be supported on piles penetrating beyond the soft upper soils to provide proper foundation support.</p>



Source: Presidio Trust 2007



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